A Review of the Impacts of Short-term Rental Accommodation in Queensland

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June 2023

Executive Summary

This report was commissioned by the Queensland Department of State Development, Infrastructure, Local Government, and Planning (DSDILGP) to investigate the impact that short term rental accommodation (STRA) is having in Queensland. An important issue that this work directly analyses is the impact of STRA on housing affordability and availability. It also explores the impacts of STRA in key tourism areas and seeks to provide evidence-based findings to address the key question of whether in general STRA is having a fundamental impact on housing supply or affordability. The report reviews the effect of potential regulatory and non-regulatory options that could be applied where impacts are identified.

Short-term rental accommodation (STRA) refers to accommodation that falls in-between visitor accommodation (e.g., hotels) and more formal long-term accommodation arrangements (e.g., property rentals). STRA have existed for many decades as 'holiday lettings' but have proliferated into new geographical settings due to the emergence of Airbnb and other digital platforms. Thus, while STRA are not a new phenomenon in Queensland, the expansion of digital STRA platforms merits further investigation, particularly regarding the impacts on housing across the state. In the wake of the recent housing pressures faced in Queensland, a surge of interest has catalysed a series of interrelated questions regarding the impacts of STRA on housing supply, amenity impacts, and affordability.

To carry out this study, a number of sources of data were required. Much of the international research that relates to the impact of short-term accommodation has been carried out using data from AirDNA as the source of listings on online platforms such as Airbnb. This report draws upon data collected by Deckard Technologies – a data analytics company – which sources data from several prominent digital STRA platforms such as VRBO, Stayz, and Airbnb; however, to provide, to the greatest extent possible, a comprehensive view of the impact of short-term accommodation in the state of Queensland and assess the heterogeneity of the impact at the LGA level and the suburb level, the study has brought together and made use of a variety of data sources.

The report takes a statewide approach to explaining STRA trends, with particular focus on regions more impacted by STRA. These include major cities such as Brisbane and the Gold Coast, along with other tourism-focused local government areas (LGAs) including Douglas, Noosa, and Sunshine Coast. The report also documents best practices from other jurisdictions.

The report finds that there does not appear to be a clear pattern of increase in the per cent of dwellings used for STRA over the observed period of 2018 to 2023. The proportion of dwellings used for STRA varies greatly between LGAs, ranging from less than 1% of dwelling stock in urban centres such as Brisbane, Rockhampton and Toowoomba to more than 12% in Douglas Shire. From a regional perspective, the proportion of dwellings available as STRA ranges from 0.4% in the Darling Downs to 2.1% in Far North Queensland. In general, tourism-oriented regional areas (e.g., Douglas, Noosa) have a higher proportion of the dwelling stock used for STRA than urban areas (e.g., Brisbane). This may be explained by a shortage of other accommodation options, both short-term (e.g., hotels) or long-term (e.g., for housing seasonal labour).

The number of active STRA listings in Queensland peaked in 2020-Q1 at 32,232 active listings, which corresponds to roughly 20,000 dwellings, assuming that many dwellings comprise multiple listings. As of

2023-Q1, the absolute number of listings has rebounded to nearly this figure, following a prolonged reduction of listings tied to pandemic-related border closures. More than half of these are in Southeast Queensland, particularly the Gold Coast, with smaller numbers in the Brisbane, the Sunshine Coast, and Noosa LGAs. However, this is proportional to the absolute dwelling count of the region, and within Southeast Queensland, only Noosa stands out as having more than 2% of dwellings as dedicated STRA.

Overall, the availability and occupancy of STRA in Queensland has remained steady since before the recent pandemic. What has changed, however, is the average revenue per available STRA dwelling (RevPAR), which has risen in step with changes in the long-term rental market more broadly. The availability, occupancy, and profitability of active entire-home STRAs are comparable to an average hotel accommodation in Queensland, indicating a strong financial incentive to operate STRA businesses.

Regression modelling conducted for this study to determine the relationship between rental affordability and STRA concludes that overall STRA is not a significant determinant of rental affordability statewide. It also finds no clear alignment between the suburbs where rents have increased the most and the percentage of dwellings in STRA.

Some of the key findings from the review of economic impact of STRA indicates STRA offer local residents a form of home business to assist with housing cost. This is particularly true of hosted stays. STRA have been shown to support additional small business, particularly those offering services to short-stay visitors such as cafes, restaurants, laundromats, convenience stores, etc. However, neighbourhood change related to STRA may negatively impact businesses catering to longer-stay residents. These may include car repair services, dental clinics, and other services that short-stay visitors are unlikely to use.

Key findings from the review of the amenity impact of STRA indicate that at the neighbourhood scale, STRA tend to be concentrated in areas characterised by holiday homes and high-rise apartments (units). It may generate disamenity linked to noise, particularly linked to parties or the arrival and departure of guests. STRA visitors may also not be familiar with local guidelines on rubbish removal and disposal, animal conduct (e.g. dogs), etc. On a building scale, disamenity may be associated with an increased number of 'strangers' with access to common areas, who may not follow codes of conduct (e.g. rubbish by the pool, excess noise early in the morning).

This study has limitations, and it is important to acknowledge data concerns. The major limiting factor arises from the lack of detailed, widely available and accurate data tracking STRA activity. There is uncertainty about the exact nature and precise location of STRA activity in any region. The access to data on STRA is currently reliant on private providers who rely on compiling information via scraped data. The lack of accurate STRA data means limited ability to verify claims regarding geographical location, test the effectiveness of regulation, test the effect of STRA on affordability and housing supply, or the possible benefits of the availability of STRA in certain key locations. Further, the form of the data provided makes it difficult to accurately evaluate the economic impacts of STRA in any meaningful way.

The report makes two main recommendations. The first is the implementation of a STRA registration system that parallels experience in other Australian States. The second is that there is no evidence to support Statewide STRA restrictions.

The first recommendation if implemented will bring a number of benefits to both the STRA sector and broader community. It will provide for the establishment of a code of conduct, information guidelines,

with helpful links to relevant agencies. It will assist with the enforcement and compliance with safety regulations. In addition, it will open the possibility for the establishment of a web portal explaining how to identify and define STRA and assist residents in all areas of the state to find links to the rules pertaining to STRA and the intensity of STRA usage in their suburb. This may help homebuyers and renters when considering where they want to locate. The report points out that STRA lettings where the host remains living in the property while the guests are present, are consistent with the traditional model of Bed and Breakfast accommodation and the origins of STRA companies like Airbnb. These align with recent discussions on the more efficient use of dwelling stocks infrastructure, and the intensification of dwelling uses in areas such as student and shared accommodation.

The second recommendation arises as there is no evidence to support statewide STRA restrictions. The rationale for this recommendation is that Queensland is a diverse state with a range of STRA scenarios, ranging from beachside 'holiday lettings' to urban shared rooms to farm stays. Councils themselves may differ in their perspectives—some may welcome STRA and others may not. The number of STRA statewide is found to be plateauing, as there are roughly the same number of STRA as there were in Q1 2020, and high rent prices seem to be persuading some hosts to return properties to long-term markets. Some councils, including Noosa and Brisbane, are already crafting their own legislation. The statewide focus should be on building consistent and accurate tracking data to enable local authorities to monitor STRA activity in their community, along with ensuring community needs are addressed and property rights are maintained.

In summary, we caution that while increasing STRA-intensity may be associated with rent increases or other negative amenity outcomes in a limited number of hot-spot locations, we have not been able to statistically determine if the STRA-intensity is causing these outcomes or is merely a consequence of other factors playing out in these markets. It is also likely that the impact of negative outcomes may concentrate in some segments of the population while benefits associated with the changing desirability of these areas may accumulate to a less concentrated segment of the population (e.g. business owners, real estate investors, visitors to these regions, or workers in these locations), some of whom might not reside in the same area.

Glossary of Terms

ABS Australian Bureau of Statistics

Active STRA listings: Active listings are listings with at least one day booked or available – as a calendar day is observed 365 times, we only consider the final observation for this calculation. The count of active listings for a quarter is calculated by examining the calendars for that quarter and including any listing which had at least one day booked or available. **(Deckard definition)**

Active STRA dwellings: Active STRA dwellings are calculated using a ratio of 1.62 (i.e., 1.62 active listings to 1 active dwelling) based on the Deckard's ground-truth analysis of Brisbane's STRA and property market. **(Deckard definition)**

Entire-home STRA: Whether a listing refers to an entire or partial listing is one of the metadata points described in the listing (i.e. "Entire Home" vs "Partial Home") on STRA platforms. **(Deckard definition)**

Home-based business means the use of a dwelling or domestic outbuilding on premises for a business activity that is subordinate to the residential use of the premises. ([Queensland Planning Act 2016, Planning Regulation 2017](#))

LGA: Local Government Area, council or shire.

Permanent STRA: An estimated count of permanent STRA properties. This was calculated using calendar data across the quarter and set to TRUE if: At least 60 days were made available or booked in the quarter. At least 1 day was booked. (**Deckard definition**)

Residential STRA: Whether a listing refers to a commercial or residential property can only truly be determined after address mapping, by property use code and zoning. However, Deckard has an NLP based model for estimating whether a listing is residential. This model is trained on our ground-truth address-mapped data and assesses NLP features. Its recall on residential listings is 98.3%. (**Deckard definition**)

RevPAR Revenue per available room - Dollars received from bookings in the quarter / Nights Available. (**Deckard definition**)

Short-term accommodation (Queensland Planning Act 2016, Planning Regulation 2017)

(a) means the use of premises for: (i) providing accommodation of less than 3 consecutive months to tourists or travellers; or (ii) a manager's residence, office, or recreation facilities for the exclusive use of guests, if the use is ancillary to the use in subparagraph; but (b) does not include a hotel, nature-based tourism, resort complex or tourist park

Statistical Area Level 2 (SA2): SA2s generally have a population between 3,000 and 25,000 with an average of about 10,000 people. SA2s in remote and regional areas generally have smaller populations than those in urban areas. (ABS, 2021a)

STRA (Deckard definition): Short-term rental accommodation. Deckard maintains five scrapers of relevance to the STRA project, targeting Airbnb, VRBO (Stayz), Booking.com, TripAdvisor/Flipkey and a final catch-all scraper targeting other smaller STRA sites.

The first task is to identify all listings belonging to the Queensland region. Deckard endeavours to exhaustively scrape all above websites each week and employs two methods to identify all relevant listings.

For VRBO, TripAdvisor, and smaller STRA sites, the listing id-space is incrementing and can be searched starting from 0. Each week, the scrapers will start from the highest previously known id and search until they reach the end of the currently active ID space. Previously de-activated listings are also queried again during this process to check if they have been reactivated. Once a listing has been scraped, its metadata, including latitude/longitude, are loaded into Rentalscape (Deckard's modelling suite) to allow geographic querying.

For Airbnb and Booking.com, the id space is not incrementing integers and a map-search algorithm is employed. The scrapers will load areas of interest (in this case, Queensland), break the map into tiles, and scan each tile separately. Listing IDs are then individually scraped, and metadata including, latitude/longitude are loaded into Rentalscape to allow geographic querying.

STRA Booked vs Blocked vs Available (**Deckard definition**)

> "available" - the property was available for rent but empty

> "booked" - the property was unavailable as there was a paying customer

> "blocked" - the property was unavailable but there was not a paying customer. This is the host using it for other things (cleaning, renovations, staying in it themselves).

Suburb: In Deckard data, suburb boundaries are aligned with the non-ABS structure of suburbs and localities (ABS, 2021b). The boundaries of the suburbs do not perfectly align with LGA boundaries or SA2 boundaries. In some cases, a suburb overlaps in two LGAs (e.g. Noosaville in both Sunshine Coast and Noosa LGAs).

% Dwellings used for STRA **per LGA:** % Dwellings used for STRA per LGA for the period 2018-2023 (2023Q1, January - March) is obtained by computing the ratio of the Number Residential STRA Dwellings (estimate) to the number of dwellings reported by the ABS census (2021), by LGA. **(Deckard definition)**

Key Findings

1. Key findings from the Scale and Scope Study

The key statistics of scale and scope STRA at the state, region, and LGA levels are listed in **Table A1** in **Appendix 2**. The key findings at each geographical level are summarised in bullet points below:

1.1. State

- The Covid-19 pandemic significantly disrupted the STRA sector [between the second quarter of 2020 and the fourth quarter of 2021]
- As of the first quarter of 2023, there were 32,033 active STRA listings for 19,773 active STRA dwellings, of which 11,193 dwellings were estimated to be used for STRA on a permanent basis. Permanent STRA dwellings account for less than 1% of the total dwelling stock in Queensland.
- The availability of active entire-home STRA, on average, is about 80% on a quarterly basis, with an average utilisation rate of 60% for apartments and 50% for houses.
- The average revenue per available STRA dwelling has a strong seasonal dynamic closely tied to holiday periods.
- Active entire-home STRA are comparable to hotel accommodations in terms of occupancy and profitability, suggesting a strong financial incentive attached to the STRA business in Queensland.

1.2. Regions

- South East Queensland has the largest regional STRA market, comprising two thirds of Queensland's STRA dwellings.
- Far North Queensland (including Cairns) has the highest proportion of active and permanent STRA dwellings in relation to all residential dwellings at 2.1 per cent and 1.2 per cent, respectively, suggesting that STRA fill a market gap tied to the lack of more formal temporary and permanent accommodation such as hotels.
- Availability and utilisation of STRA dwellings are typically higher in urban areas, while revenue is highest in tourism-oriented areas.
- STRA businesses seeking 'tree-change' and 'sea-change' locations arguably related to emerging trends in tourism and migrations, indicating the need to monitor the STRA markets in high-demand tourism regions.

1.3. Local Government Areas

- Most STRA listings are in the densely populated coastal and coast-adjacent regions in Queensland, that include Gold Coast, Sunshine Coast, Brisbane, Noosa, Douglas, Whitsunday, Cairns, Moreton Bay, and Townsville.
- Douglas (12.4%), Noosa (6.4%), and Whitsunday (4.5%) have the highest shares of residential dwellings used for active STRA.
- Douglas (4.5%) and Noosa (3.1%) are estimated to have a significantly higher proportion of residential dwellings used for STRA on a permanent basis than other LGAs.

1.4. Noosa (suburbs)

- Entire STRA houses and apartments comprise 97% of all 1,921 active STRA dwellings.
- Permanent STRA dwellings account for around half of all active STRA dwellings.
- Popular tourist suburbs, including Sunshine Beach (9.5%) and Noosa Heads (7.7%), are estimated to have the highest share of residential dwellings used for permanent STRA.

2. Key findings from the Affordability Study

2.1 STRA Affecting Supply

- There does not appear to be a clear pattern of increase in the per cent of dwellings used for STRA over the observed period of 2018 to 2023.
- There is no evidence of a generalised increase in the proportion of dwellings that are used for STRA at state or LGA levels.
- Most STRA listings are in the densely populated coastal and coast-adjacent regions in Queensland, that include Gold Coast, Sunshine Coast, Brisbane, Noosa, Douglas, Whitsunday, Cairns, Moreton Bay, and Townsville.
- Douglas (12.4%), Noosa (6.4%), and Whitsunday (4.5%) have the highest shares of residential dwellings used for active STRA.
- Douglas (4.5%) and Noosa (3.1%) are estimated to have a significantly higher proportion of residential dwellings used for STRA on a permanent basis than other LGAs.
- Popular tourist suburbs like Sunshine Beach (9.5%) and Noosa Heads (7.7%) are estimated to have the highest share of residential dwellings used for permanent STRA.
- In Noosa entire STRA houses and apartments comprise 97% of all 1,921 active STRA dwellings. Permanent STRA dwellings account for around half of all active STRA dwellings.
- Only Noosa stands out as having more than 2% of dwellings as dedicated to STRA.

2.2 Rental Affordability

- The most vulnerable households (single income) have been spending more than 30% of their income on rent over the period studied (2016-2022) in the LGAs of Brisbane, Gold Coast, Sunshine Coast, Noosa and Douglas.
- Rental affordability of houses had decreased by 2022 over 2019 figures in the Gold Coast (12%), the Sunshine Coast (13.10%), Noosa (22.35%) and Douglas (10.34%). They remained steady for Brisbane and Whitsunday.
- Rental affordability of units had decreased by 2022 over 2019 figures in the Gold Coast (7.4%), Noosa (24.80%) and Douglas (10.34%). They remained steady for Brisbane and Whitsunday and increased for the Sunshine Coast (59%).
- There is no evidence of a generalised increase in the proportion of dwellings that are used for STRA at the LGA level.

- There is no clear alignment between the suburbs where rents increases have been the highest and the percentage of dwellings devoted to STRA.
- Consistent with the findings for other jurisdictions around the world, a study of how the penetration of STRA is correlated with housing market outcomes finds for Queensland:
    a. STRA is a small contributor in explaining rent prices. The contribution typically in the range of 0.2% – 0.5% from an increase of 10% in the total number of STRA total listings, else equal.
    b. Dwelling stocks are a significant contributor in explaining rent prices. The contribution of a 10% increase in the overall stock of dwellings is expected on average to lead to a decreased in rent prices in the range of 1% to 2%, else equal.

3. Key findings from Economic Contribution of STRA
- Industry provided estimates suggest a large economic benefit from STRA. However, international studies evaluating the impact of STRA suggest that such estimates tend to be large relative to the benefits received.
- A clear benefit of STRA goes to landlords who can now more effectively diversify into the short-term rental market.
- Benefits also accrue to travellers, who now potentially have a greater choice of rental accommodation that may also be more affordable and better suited to their needs.
- More accommodation options might facilitate more visitors or potential longer stays in a region creating larger economic benefits.
- It is noted that not all travellers using STRA are tourists. Other important categories of users include people staying near hospitals for medical treatments, people relocating from interstate or overseas, and workers on temporary job assignments.
- STRA offer local residents a form of home business to assist with housing cost. This is particularly true of hosted stays.
- STRA have been shown to support additional small business, particularly those offering services to short-stay visitors such as cafes, restaurants, laundromats, convenience stores, etc.
- STRA-related businesses may also support entrepreneurial activities in regions with historically fewer such opportunities.
- Neighbourhood change related to STRA may also displace businesses catering to longer-stay residents. These may include car repair services, dental clinics, and other services that short-stay visitors are unlikely to use.
- There is international evidence to suggest that STRA impacts hotel performance. However, higher quality hotels and chain hotels are found to be less affected by STRA.

4. Key findings from Amenity Impact Review
- On a regional scale, STRA are primarily concentrated in urban areas, with the majority in holiday-oriented LGAs such as the Gold Coast, Noosa and Douglas Shire. The implication of this is that the amenities needed to support tourism are generally already in place.

- On a regional scale, STRA also extend to areas not typically associated with tourism. Though this occurs in relatively lower numbers, regions may be unaccustomed to larger numbers of short-stay visitors.
- On a neighbourhood scale, STRA tend to be concentrated in areas characterised by holiday homes and high-rise apartments (units). There are exceptions to this. Additional amenity may be generated by support for additional local businesses (cafes).
- On a neighbourhood scale, STRA may generate disamenity linked to noise, particularly linked to parties or the arrival & departure of guests. STRA visitors may also not be familiar with local guidelines on rubbish removal and disposal, animal conduct (e.g. dogs), etc.
- On a building scale, disamenity may be associated with an increased number of 'strangers' with access to common areas, who may not follow codes of conduct (e.g. rubbish by the pool, excess noise early in the morning).

5. Regulatory approaches to STRA

- The international evidence presented shows that regulatory frameworks often encompass requirements for hosts to obtain a permit or register their properties to ensure compliance with regulations and zoning requirements.
- In areas heavily impacted by STRA, international regulations often encompass one or several of the following restrictions: guest limits, limits on the number of days for unhosted visits in a year, limits on the number of permitted STRA properties in a region, tools for residents to share concerns about negative amenity impacts (eg noise complaints), large fines for unregistered STRA bookings.
- Another feature of global regulatory practices is that it is usually concentrated and implemented at a city or regional level to deal with city-specific concerns.
- The approach to STRA regulation in Australia mirrors international practice with examples of other states or cities outside of Queensland using registration systems, distinguishing between hosted and non-hosted STRA, and in some regions implementing daily limits for STRA.
- In Queensland, the legislation pertaining to short-term rental accommodation (STRA) depends on the location of the property. Local councils can regulate STRA under their local planning laws which are usually outlined in the relevant town planning scheme or city plans.
- In Queensland there has been a recent trend for local governments to regulate STRA through increasing rates for properties that engage in STRA. For example, Brisbane City Council, Noosa Shire Council and Sunshine Coast Council have introduced a new general rate category, "transitory accommodation". Council may also require STRA landlords to obtain a development approval for their dwelling if used for STRA.

Recommendations

The primary focus of this project has been to address the extent to which STRA is impacting the permanent rental market in Queensland. Based on the evidence presented in this report, there are significant documented benefits to Queensland businesses and residents arising from the operations and availability of STRA. This study has found tenuous evidence of links between STRA and rental affordability.

UQ Recommendation	Rationale	Key finding/s
1 **Implementation of STRA registration system that parallels experience in other Australian States**	• Support local governments in monitoring STRA activity. • A systematic, project-based approach to collecting data, sharing experiences and unifying definitions across LGAs in the state. • Provide state government, councils and researchers with access to real-time, accurate data. • Assist small local government areas for whom the cost of obtaining fee-based data on an ongoing basis may be prohibitive.	• There is lack of detailed, widely available and accurate data tracking STRA activity. • There is uncertainty about the exact nature and precise location of STRA activity in any region. • The access to data on STRA is currently reliant on private providers (e.g. Deckard, Airdna) who rely on compiling information via scraped data. • The lack of accurate STRA data means limited ability to verify claims regarding geographical location, test effectiveness of regulation, test the effect of STRA on affordability and housing supply, or the possible benefits of the availability of STRA in certain key locations. • The evidence from other states in Australia (e.g. New South Wales) indicates current best practice. • There is support from large STRA providers such as Airbnb for a registration system.

	• **Code of conduct and centralised reporting system for non-compliance with code of conduct**	• Code of conduct for booking agents, hosts, guests and letting agents. • Allows for easy compliance checks with local laws. • Allows sharing and leads to unifying approaches to responses and collection of data for monitoring and evaluation.	• Evidence from other jurisdictions indicates best practice (e.g. New South Wales). • There are diverse approaches across LGAs. • There is a lack of overarching guidance.
	• **Residents' portal with advice about STRA rules that apply to a property**	• Residents in all areas of the state can easily enter their address and find clear advice about the rules pertaining to STRA.	• There is lack of detailed, widely available and accurate data to assist the community.
2	**No support for Statewide STRA restrictions**	• Queensland is a diverse state with a range of STRA scenarios, ranging from beachside 'holiday lettings' to urban shared rooms to farm stays. • Councils themselves may differ in their perspectives—some may welcome STRA and others may not. • The number of STRA statewide is found to be plateauing. There are roughly the same number of STRA as there were in Q1 2020. • Councils, including Noosa and Brisbane, are already crafting their own legislation. Statewide focus should be ensuring this is consistent with community needs and property rights, and fair.	• There is little evidence to support the claim that increasing STRA intensity accounts for a substantial proportion of the increase in rents observed since the start of 2020. • On average STRA takes a small proportion of the dwelling stocks in Queensland. • On average for the state the effect of STRA on rent increases is either not significant or small (between 2% and 5%). • There is no alignment between areas with high penetration of STRA and those where rents have increased the most. • Evidence suggests that the number of dwellings available for STRA remains steady at roughly 1% of Queensland's housing stock. • Evidence suggests availability and occupancy remain steady over time. • Evidence suggests the majority of STRA are located in major cities and tourism-

		oriented regions with a history of 'holiday lettings'
		• Wide variation in STRA availability between LGAs and regions suggest blanket policies are an inappropriate tool/approach.

Recommendation 1. Implementation of STRA registration system that parallels experience in other Australian States.

Rationale

- Support local governments in monitoring STRA activity.
- A systematic, project-based approach to collecting data, sharing experiences and unifying definitions across LGAs in the state.
- Provide state government, councils and researchers with access to real-time, accurate data.
- Assist small local government areas for whom the cost of obtaining fee-based data on an ongoing basis may be prohibitive.

As a starting point to support placed-based policy measures we encourage the Queensland Government to mirror the development in New South Wales of a centralised registration and data collection system to support local governments in monitoring STRA activity and ensuring compliance with safety regulations.

One limitation that both governments and researchers encounter in evaluating the impact of STRA is the lack of detailed, widely available and accurate tracking data on STRA activity. While data providers, such as the data service used for this study, offer a commercial fee-based service to track STRA activity, it is noted that providers of such data in Australia typically use some form of web-scrapping and machine learning algorithms to estimate STRA activity. While there are some advantages of this approach, it is not always accurate and there will be some level of uncertainty about the exact nature and precise location of STRA activity in any region. Also, for small local government areas the cost of obtaining this data on an ongoing basis may be prohibitive.

The registration system would provide a number of additional benefits if it were also used as a registry for other aspects that relate to STRA.   The availability of a unified and centralised database that provides the details of STRA activity will greatly help governments and researchers evaluate the impact of STRA, the formulation of relevant policy and the introduction of evidence-based regulation. To this, there are two areas that could be used in conjunction with the registration system:

- **Code of conduct and centralised reporting system for non-compliance with code of conduct**
- Code of conduct for booking agents, hosts, guests and letting agents.
- Allows for easy compliance checks with local laws.
- Allows sharing and leads to unifying approaches to responses and collection of data for monitoring and evaluation.

- **A household friendly portal to allow residents to quickly find links to information on STRA regulations in their community**
- A user-friendly web portal will allow residents to quickly find information on STRA regulations in their community. This will serve as a resource to allow residents to find accurate information when their address is typed into the portal.

- The portal will also serve as a resource to quickly allow policy makers and researchers to understand the variety of responses to STRA regulation across the state. It may eventually allow for policy evaluation of best practice in the area of STRA regulation.

Benefits that could derive from the implementation of this recommendation are:

- Code of conduct for booking agents, hosts, guests and letting agents. This may be a series of information guidelines, with helpful links to relevant agencies. However, this may also be linked to the Residential Tenancies Authority (RTA), which may seek to establish guidelines for issues like bond, deposits, reviews, and other aspects of tenancy.
- Local guide to enforce compliance with safety regulations. This is likely to fall under several State-level portfolios, including planning (occupancy rules), health & safety (e.g. fire codes), and law enforcement (e.g. police advice on noise). Advice to hosts should be simple and consistent, and we suggest a 'one stop shop' approach for hosts and guests interested in accessing information on STRA regulations.
- A web portal explaining how to identify and define STRA, particularly as there may be ambiguity with the large number of holiday listings and motels listing on the same sites (e.g. Airbnb) as genuine STRA.
- A resident-friendly portal so that residents in all areas of the state can easily enter their address and find links the rules pertaining to STRA and the intensity of STRA usage in their suburb. This may help homebuyers and renters when considering where they want to locate.

- **Evidence to support the recommendation,**
    1) There is lack of detailed, widely available and accurate tracking data on STRA activity.
    2) There is uncertainty about the exact nature and precise location of STRA activity in any region.
    3) The access to data is currently reliant on private providers who rely on scraped data.
    4) There is lack of accurate STRA data means limited ability to verify claims regarding geographical location, test effectiveness of regulation, effect of STRA on affordability and housing supply, or the possible benefits of the availability of STRA in certain key locations.
    5) The evidence from other states (e.g. New South Wales) indicates current best practice.
    6) There is support from large STRA providers such as Airbnb for a registration system.
    7) There is a variety of approaches to regulation, and it can be difficult for residents to quickly find accurate information for their community.

Recommendation 2. No support for Statewide STRA restrictions

Rationale

- Queensland is a diverse state with a range of STRA scenarios, ranging from beachside 'holiday lettings' to urban shared rooms to farm stays.
- Councils themselves may differ in their perspectives—some may welcome STRA, whereas others may take a more cautious approach.
- The number of STRA statewide is found to be plateauing. There are roughly the same number of STRA as there were in Q1 2020. However, longer term patterns have been obscured by the impact of the pandemic.
- Councils, including Noosa and Brisbane, are already crafting their own legislation.

Evidence to support this recommendation,

- There is little evidence to support the claim that increasing STRA intensity accounts for a substantial proportion of the increase in rents observed since the start of 2020.
- On average STRA takes a small proportion of the dwelling stocks in the state.
- On average for the state the effect of STRA on rent increases is either not significant or small (a 10% increase in total STRA listings leads to 0.2%-0.5% increase in rent prices).
- There is no alignment between areas with high penetration of STRA and those where rents have increased the most.
- Evidence suggests that the number of dwellings available for STRA remains steady at roughly 1% of state housing stock.
- Evidence suggests availability and occupancy remain steady over time.
- Evidence suggests majority of STRA are located in major cities and tourism-oriented regions with a history of 'holiday lettings'
- Wide variation in STRA availability between LGAs and regions suggest blanket policy is inappropriate tool.

At a state level, there is little evidence to support the claim that increasing STRA intensity accounts for a substantial proportion of the increase in rents observed since the start of 2020. There is however significant support for the claim that decreasing stocks of rental properties (for reasons other than STRA) combined with strong demand for rental accommodation resulting from shifts in intra- and inter-state migration patterns following the COVID-19 pandemic are the primary drivers of the disruption in the rental market.

Given this analysis, we find no reason to recommend the implementation of statewide STRA daily limits (as is the case with New South Wales). However, our analysis does point to potential impacts that have occurred over a relatively short period of time in certain hot-spot locations that may be associated with high-levels of STRA activity. In such markets, local councils may be best placed to determine and implement short-term measures to limit wider negative impacts on the immediate community. This is particularly important in the current environment where challenges in the construction sector resulting from disruption to supply chains, high inflation, and shortages of skilled labour are limiting the ability of

developers (in both the private and social housing sectors) and investors to respond quickly to changing market demands. There may also be amenity issues that are best addressed with consideration of local circumstances. We discuss potential place-based approaches below.

While the current situation does not support statewide STRA restrictions, we do note that our analysis is based on a relatively short time period of data provided by DSDILGP. A complicating factor is that the identification of potential impacts of STRA activity has been heavily impacted by the pandemic. The statistics presented in the report show a large fall in activity during the initial phase of the pandemic. This was then followed by a slow recovery as intrastate travel resumed before an easing of border restrictions saw a rapid turnaround in activity as pent-up demand boosted domestic tourism. Over the last two years, international travel and tourism resumed and recently there has been a return of international students and the resumption of overseas migration, which has further supported growth in the sector. The number of STRA properties in the state has now returned to pre-pandemic levels. However, the long-term growth rate and trajectory of STRA is difficult to predict given the disruptions of the last three years.

We also caution that while increasing STRA-intensity may be associated with rent increases or other negative amenity outcomes in a limited number of hot-spot locations, we have not been able to statistically determine if the STRA-intensity is causing these outcomes or is merely a consequence of other factors playing out in these markets. It is also likely that the impact of negative outcomes may concentrate in some segments of the population while benefits associated with the changing desirability of these areas may accumulate to a less concentrated segment of the population (e.g. business owners, real estate investors, visitors to these regions, or workers in these locations), some of whom might not reside in the same area.

Impact of STRA Investigation

Summary

Short-term rental accommodation (STRA) refers to accommodation that falls in-between visitor accommodation (e.g., hotels) and more formal long-term accommodation arrangements (e.g., property rentals). STRA have existed for many decades as 'holiday lettings' but have proliferated into new geographical settings due to the emergence of Airbnb and other digital platforms. Thus, while STRA are not a new phenomenon in Queensland, the expansion of digital STRA platforms merits further investigation, particularly regarding the impacts on housing and planning across the state. In the wake of the recent housing pressures faced in Queensland, a surge of interest has catalysed a series of interrelated questions regarding the impacts of STRA on housing supply, amenity, and affordability.

This report summarises the state of STRA in Queensland. It draws upon data collected by Deckard Technologies – a data analytics company – which is sourced from several prominent digital STRA platforms such as VRBO, Stayz, and Airbnb. The report takes a statewide approach to explaining STRA trends, with particular focus on regions more impacted by STRA. These include major cities such as Brisbane and the Gold Coast, but also tourism-focussed local government areas (LGAs) including Douglas, Noosa, and Sunshine Coast. The document also analyses the findings of a recent Noosa report vis-a-vis data from Deckard Technologies and documents best-practices from other jurisdictions.

The report finds that there does not appear to be a clear pattern of increase in the per cent of dwellings used for STRA over the observed period of 2018 to 2023. The proportion of dwellings used for STRA varies greatly between LGAs, ranging from less than 1% of dwelling stock in urban centres such as Brisbane, Rockhampton and Toowoomba to more than 12% in Douglas Shire. From a regional perspective, the proportion of dwellings available as STRA ranges from 0.4% in the Darling Downs to 2.1% in Far North Queensland. In general, tourism-oriented regional areas (e.g., Douglas, Noosa) have a higher proportion of dwellings stock used for STRA than urban areas (e.g., Brisbane). This may be explained by a shortage of other accommodation options, both short-term (e.g., hotels) or long-term (e.g., for housing seasonal labour).

The number of active STRA listings in Queensland peaked in 2020-Q1 at 32,232 active listings, which corresponds to roughly 20,000 dwellings, assuming that many dwellings comprise multiple listings. As of 2023-Q1, the absolute number of listings has rebounded to nearly this figure, following a prolonged reduction of listings tied to pandemic-related border closures. More than half of these are in Southeast Queensland, particularly the Gold Coast, with smaller numbers in the Brisbane, the Sunshine Coast, and Noosa LGAs. However, this is proportional to the absolute dwelling count of the region, and within Southeast Queensland, only Noosa stands out as having more than 2% of dwellings as dedicated STRA.

Overall, the availability and occupancy of STRA in Queensland has remained steady since before the recent pandemic. What has changed, however, is the average revenue per available STRA dwelling (RevPAR), which has risen in step with changes in the long-term rental market more broadly. The availability, occupancy, and profitability of active entire-home STRAs are comparable to an average hotel accommodation in Queensland, indicating a strong financial incentive to operate STRA businesses.

This report also documents the results of a series of regression analyses performed to determine the relationship between rental affordability and STRA. The primary conclusion from this exercise is that there is no clear alignment between the suburbs where rents have increased the most and the percentage of dwellings in STRA, indicating that overall STRA is not the biggest determinant of rental affordability statewide.

The final sections of the report discuss the economic impact, particularly on the hotel sector, along with a review of amenity impacts in the state.

Data Sources and Enrichment

In order to carry out this study, a number of sources of data were required. Much of the international research that relates to the impact of short-term accommodation has been carried out using data from AirDNA as the source of listings on online platforms such as Airbnb. To provide comprehensive econometric modelling, data on short-term listings must be linked to and enriched with a number of other sources of information that capture the state of the local housing markets such us rent prices, dwelling stocks, characteristics of dwellers, and regulatory environments.

The research team has attempted to bring together and make use of a variety of data sources in order to provide, to the extent possible, a comprehensive view of the impact of short-term accommodation in the state of Queensland and assess the heterogeneity of the impact by conducting analyses at the LGA level and the suburb level.

The remaining of this section details the sources of data and their coverage.

STRA Data from Deckard

This is the primary STRA data that was provided by DSDILGP to the UQ team for the project. The team received primary data on STRA at the state, region, LGA, and suburb levels from the data provider, Deckard at the end of April 2023.

Available Statistics from Deckard Data

Table 1 exhibits descriptive statistics of the Deckard data, the coverage period (quarterly frequency) and the number of geographies within each geographical level.

Table 1. Deckard statistics on STRA at the state, region, LGA, and suburb levels

	State		Region		LGA		Suburb	
	Qtrs	N	Qtrs	N	Qtrs	N	Qtrs	N
Active STRA listings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q1 - 23Q1	517
Active STRA dwellings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q1 - 23Q1	517
Active STRA dwellings as a percentage of all residential dwellings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q1 - 23Q1	517

Metric	Period	State (1)	Period	Region (7)	Period	LGA (21)	Period	Suburb (517)
Active STRA listings/dwellings by the number of bedrooms	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q1 - 23Q1	517
Active STRA listings/dwellings by property type (entire home/other)	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q1 - 23Q1	517
Permanent STRA listings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	-	517
Permanent STRA dwellings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	-	517
Permanent STRA dwellings as a percentage of all residential dwellings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	-	517
Permanent STRA listings/dwellings by the number of bedrooms	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q4 - 23Q1	517
Available days, booked days, average daily rate (ADR), and revenue per active rental (RevPAR) for active entire-home STRA listings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q4 - 23Q1	517
Available days, booked days, ADR, and RevPAR breakdown by the number of bedrooms	18Q2 - 23Q1	1	18Q2 - 23Q1	7	18Q2 - 23Q1	21	22Q4 - 23Q1	517
Available days, booked days, ADR, and RevPAR breakdown for permanent STRA listings	18Q2 - 23Q1	1	18Q2 - 23Q1	7	22Q4 - 23Q1	21	22Q4 - 23Q1	517

Deckard data have comprehensive time series coverage at the state and region (seven regions in Queensland) levels, with summary statistics and estimations starting from 2018-Q2. Deckard data only covered 21 out of the 77 LGAs in the state, with a period coverage of 2018Q2 to 2023Q1. Not all LGAs were reported due to the sparsity of STRAs in the less populated LGAs, which results in increased errors in estimation for the Deckard algorithm on some of the metrics (e.g. permanent STRA). Given DSDILGP's interest and the attention on six high-profile LGAs (Brisbane, the Gold Coast, the Sunshine Coast, Noosa, Whitsunday, and Douglas), statistics and estimations on 517 suburbs (see definition of suburbs in the glossary) for these six LGAs are further requested. Deckard indicated the modelling is difficult and there is potential for large errors at the more disaggregated level. The data provided covered active listings/dwellings for 2022-Q1 – 2023-Q1, and permanent STRA dwellings/operation for 2022-Q1 and 2023-Q1.

Shortcomings of Deckard Data

Besides the limitations on data availability at different granularity levels, the UQ team also raise the following two major shortcomings of the Deckard data:

1. Hosted and non-Hosted STRA

While Deckard data provides rich information about STRA listings and operations, it does not provide information regarding hosted and non-hosted STRA dwellings currently. Identifying the status of a non-hosted STRA dwelling (i.e., a residential dwelling used for STRA without the presence of its owners or long-term renters on-site) is a key step towards understanding the direct impact of STRA on residential housing supply.

2. Coverage of the Deckard data

The geographical coverage of the data provided (as listed above) implied modelling could only be conducted at the LGA level with the exception of a subsample of LGAs where suburb level data were made available. The time period coverage (as listed above) limited some of the modelling that could be carried out with this source of data.

Data Enrichment

To address the limitations of the available data on short-term accommodation, the UQ team made use of a number of other sources of data, including detailed data on STRA listings from alternative sources.

The UQ team sourced additional data for this study as follows:

- AirDNA STRA listing data: AirDNA is an industry-leading provider of data and analytics for the STRA industry. Detailed time series STRA listing data (for the period 2016 – 2022) at the Australian Bureau of Statistics' SA2s level (please consult the Glossary for the definition of SA2s) across the entire state of Queensland allowed us to benchmark and compare findings based on Deckard STRA data for the modelling work on rental affordability.
- CoreLogic Hedonic Rental Index: CoreLogic is an industry-leading real estate data and analytic company in Australia. The Hedonic Rental Index utilises comprehensive information on the attributes and characteristics of residential properties (such as location, land size, lot size, and bedrooms) to produce the index of rental price changes at the SA2 level.
- Australian Property Monitor (APM) SA2 level median rent prices: APM is a real-estate data tool owned by the Australian-based real-estate data company, Domain Group. The time series median rent prices (2016-2022) were used in the econometric modelling of the potential impacts of STRA on rental affordability.
- CoreLogic SA2 level AVM median rental prices: CoreLogic's AVM median rent prices at the SA2 level for the state of Queensland (2016-Q1 - 2023-Q1) were used to compare the robustness of findings on the impact of STRA on rental affordability to those obtained with APM data.
- Data published by the Australian Bureau of Statistics (ABS) on median household income, high-skilled population, and residential housing stock at the SA2 level were included in the modelling. These factors have been used by international studies and are known to be significant in explaining the movement of rent price levels.

A major limiting factor faced by the team was the very short time span available to complete the project, including a number of delays in the delivery of the key Deckard data.

Scale and Scope of STRA

Key findings

State
- The Covid-19 pandemic significantly disrupted the STRA sector [between the second quarter of 2020 and the fourth quarter of 2021]

- As of the first quarter of 2023, there are 32,033 active STRA listings for 19,773 active STRA dwellings, of which 11,193 dwellings are estimated to be used for STRA on a permanent basis. Permanent STRA dwellings account for less than 1% of the total dwelling stock in Queensland.
- The availability of active entire-home STRA, on average, is about 80% on a quarterly basis, with an average utilisation rate of 60% for apartments and 50% for houses.
- The average revenue per available STRA dwelling has a strong seasonal dynamic closely tied to holiday periods.
- Active entire-home STRA are comparable to hotel accommodations in terms of occupancy and profitability, suggesting a strong financial incentive attached to the STRA business in Queensland.

Regions
- South East Queensland has the largest regional STRA market comprising two thirds of Queensland's STRA dwellings.
- Far North Queensland (including Cairns) has the highest proportion of active and permanent STRA dwellings in relation to all residential dwellings at 2.1 per cent and 1.2 per cent, respectively, suggesting that STRA fill a market gap tied to the lack of more formal temporary and permanent accommodation such as hotels.
- Availability and utilisation of STRA dwellings are typically higher in urban areas, while revenue is highest in tourism-oriented areas.
- STRA businesses seek 'tree-change' and 'sea-change' locations arguably related to emerging trends in tourism and migrations, indicating the need to monitor the STRA markets in high-demand tourism regions.

Local Government Areas
- Most STRA listings are in the most densely populated coastal and coast-adjacent regions in Queensland, that include Gold Coast, Sunshine Coast, Brisbane, Noosa, Douglas, Whitsunday, Cairns, Moreton Bay, and Townsville.
- Douglas (12.4%), Noosa (6.4%), and Whitsunday (4.5%) have the highest shares of residential dwellings used for active STRA.
- Douglas (4.5%) and Noosa (3.1%) are estimated to have a significantly higher proportion of residential dwellings used for STRA on a permanent basis than other LGAs.

Noosa (suburbs)
- Entire STRA houses and apartments comprise 97% of all 1,921 active STRA dwellings.
- Permanent STRA dwellings account for around half of all active STRA dwellings.
- Popular tourist suburbs like Sunshine Beach (9.5%) and Noosa Heads (7.7%) are estimated to have the highest share of residential dwellings used for permanent STRA.

The purpose of this section is to document the scale and scope of short-term rental accommodation (STRA) in Queensland across both time and geography. We examine STRA data received from Deckard Technologies, a real estate data analytics and technology company headquartered in the United States and operating in Australia. The company provided time series summary statistics on the number of STRA active listings (by property type and the number of bedrooms), estimated number of STRA dwelling properties, estimated number of dwelling properties that could potentially be used permanently[1] for

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[1] 'Permanently' as in a STRA is available for booking at least 60 days (2/3 of days in a calendar quarter) and is booked at least for one night in a calendar quarter (typically 90 days) according to Deckard's definition.

STRA purposes, and booking metrics (availability, utilisation, nightly rate, and revenue per available rental (RevPAR)) on a quarterly basis for four distinct levels of geography: (1) the State; (2) regions; (3) local government areas (LGAs); and, (4) suburbs in high-demand LGAs[2]. The data was sourced from Deckard Technologies under a procurement contract with DSDILGP and made available for this study. The sample period for each geographic area was determined by data quality considerations made solely by the data provider. Details of the data collection process can be obtained from Deckard Technologies (https://www.deckard.com/what-we-do/). In the case of the Queensland data provided for this study, the collection process entailed combinations of web-scraping and machine-learning processing to estimate the extent of STRA in each geographical area. It should be noted that there may be errors or inaccuracies in this approach, related in part to defining what constitutes STRAs (e.g., motel rooms). The authors of this study make no representation regarding the quality of the data or sample period chosen for analysis.

Summary Findings

In this section, we will present summary outcomes of key metrics on STRA time trends between 2018-Q2 (April – June) and 2023-Q1 (January – March). This period captures the peak STRA activities in the State, the Covid-19 pandemic impacts, and the rebounding effect of post-pandemic STRA activities. The analyses are reported at three levels of geography: (1) the State; (2) regions; and, (3) LGAs. In addition, a suburb-level examination is conducted per Noosa's case given the recent discussion on housing affordability and their connection to STRA delivered in the Noosa Council Monitoring Report (internally used).

Queensland

At the State level, the quarterly time trends of the total number of active residential[3] STRA listings and total residential STRA dwelling properties are presented in Figure 1. The peak appeared in 2020-Q1 with 32,232 active listings. Based on Deckard's estimation, a listing-dwelling ratio of 1.62[4] was applied to convert the active listings into 19,896 residential dwellings. The Covid-19 pandemic significantly disrupted the STRA sector between 2020-Q2 and 2021-Q3. Only after the government signalled border reopening, the resumption of travel, and the return of normal daily activities is a rebound in the number of active STRA observed. Fuelled by a strong trend in domestic visitors and international arrivals, there is a surge in STRA in late 2022 that has continued into 2023. In 2023-Q1, the statewide total number of active STRA listings and dwellings (estimated) are 32,033 and 19,773, respectively, almost the same as the peak level.

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[2] Due to the sparsity and scarcity of STRA listings in the regional areas, only a selection of LGAs and suburbs have relatively robust statistics for STRA.

[3] Given that the focus of the project is on STRA and residential dwellings in Queensland, commercial STRA listings (e.g., hotel rooms, bed-n-breakfast) are excluded from the analysis. An active STRA listing is available for booking or booked for at least one day in a calendar quarter of the reported period.

[4] The number of STRA dwellings is estimated by dividing listings by a factor of 1.62. This was learnt from Deckard's Brisbane ground-truth data. (Deckard, 2023)
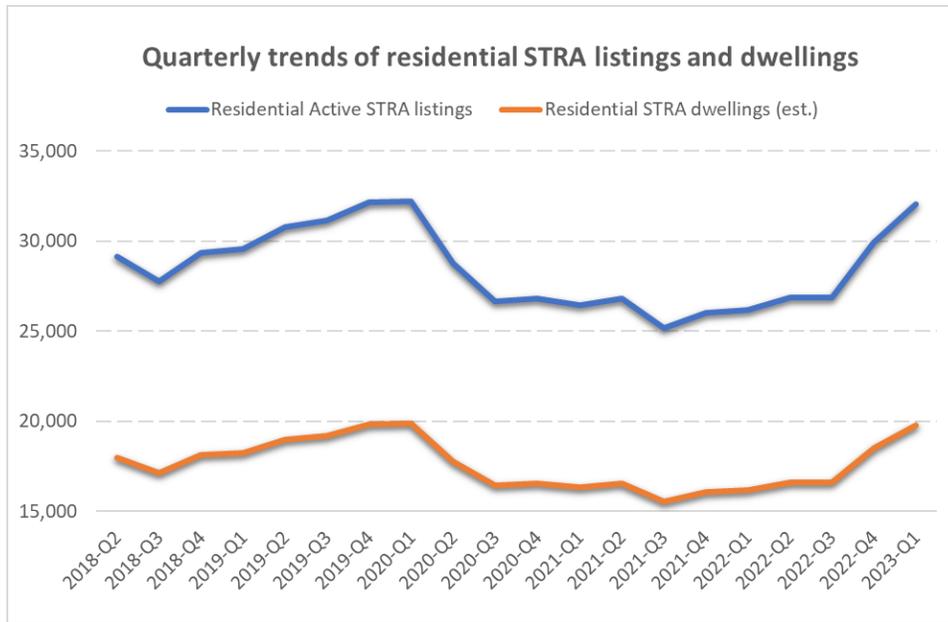
Figure 1. Quarterly trend of active STRA listings and dwelling properties (Queensland, Deckard 2023)

In terms of typical STRA listing types (i.e., entire apartment, entire house, and room(s)) alongside the total number of bedrooms contained within a given listing, the entire-home listings comprise two-thirds of all active residential STRA listings (with a slightly higher share of apartments over houses). Among all residential STRA listings, the largest category is 2-bedroom STRA listings (34%), followed by 1-bedroom (26%), 3-bedroom (23%), 4-bedroom (12%), and 5+-bedroom (5%). Arguably, there is a bigger share of smaller residential dwellings in the Queensland STRA market.

A small percentage (<1%) of residential dwellings are classified as 'permanent' STRA over time. As of 2023-Q1, the estimated total number of permanent STRA dwellings is 11,393. These permanent STRA dwellings were actively listed for at least 60 days and booked for at least one day in a calendar quarter. The quarterly trend of the estimated proportion of residential dwellings classified as the 'permanent' STRA across Queensland is given in Figure 2.

Figure 2. The estimated proportion of residential dwellings for permanent STRA[5] (Queensland, Deckard 2023)
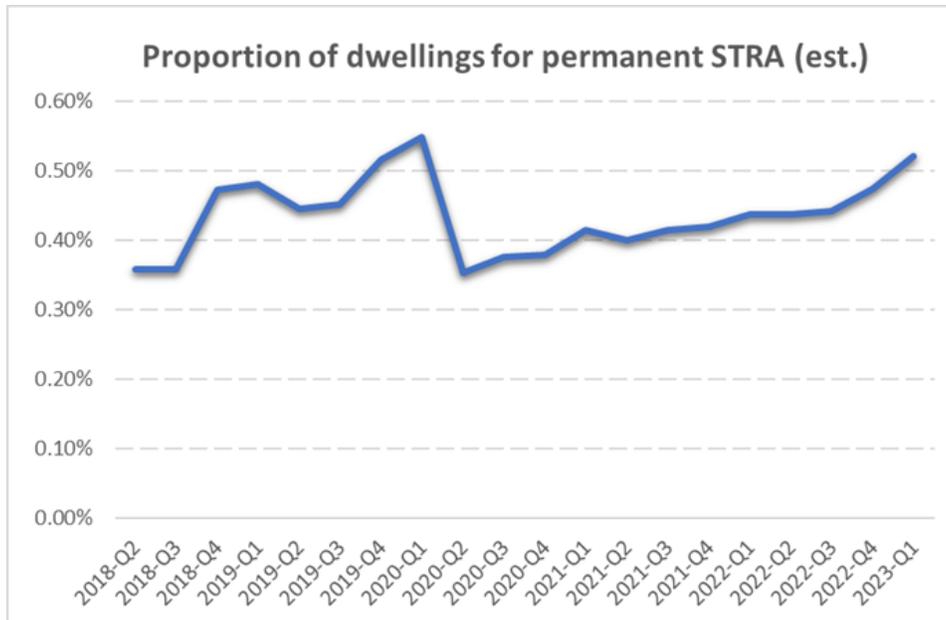
The availability, utilisation, and profitability of STRA listings offer a suite of important metrics that can help determine the extent to which the operational factors impact the STRA market. The definitions of these metrics are:

- *Availability*: the proportion of days available for booking or booked in a calendar quarter for an active STRA listing
- *Utilisation*: the proportion of days booked in a calendar quarter for an active STRA listing
- *Profitability*: is measured by revenue[6] per active rental (RevPAR), a standard profitability metric used in the hotel and accommodation sector that factors in the average daily rate and the average reservation rate of a listing.

Both entire-apartment and entire-house STRA *availability*, *utilisation*, and *profitability* are visualised as a time series in Figure 3a and Figure 3b. In 2023-Q1, the total number of active, entire-home (entire-apartment and entire-house) STRA listings is 20,656 (~12,751 active entire-home residential dwellings).

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[5] The estimation is based on Queensland's average housing dwelling stock in 2021 using the ABS data. Therefore, the estimation is subject to errors in the other reporting years.

[6] This is a crude 'revenue' measure that does not factor in the cost of cleaning, operation, tax, booking fee, etc.
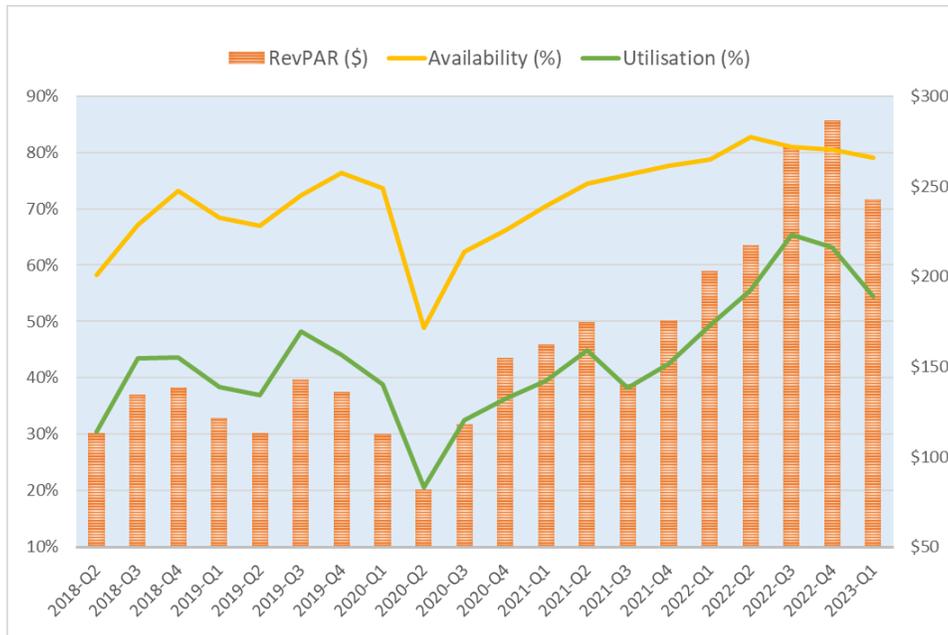
Figure 3a. Availability, utilisation, and profitability trends for entire-apartment STRA (Queensland, Deckard 2023)
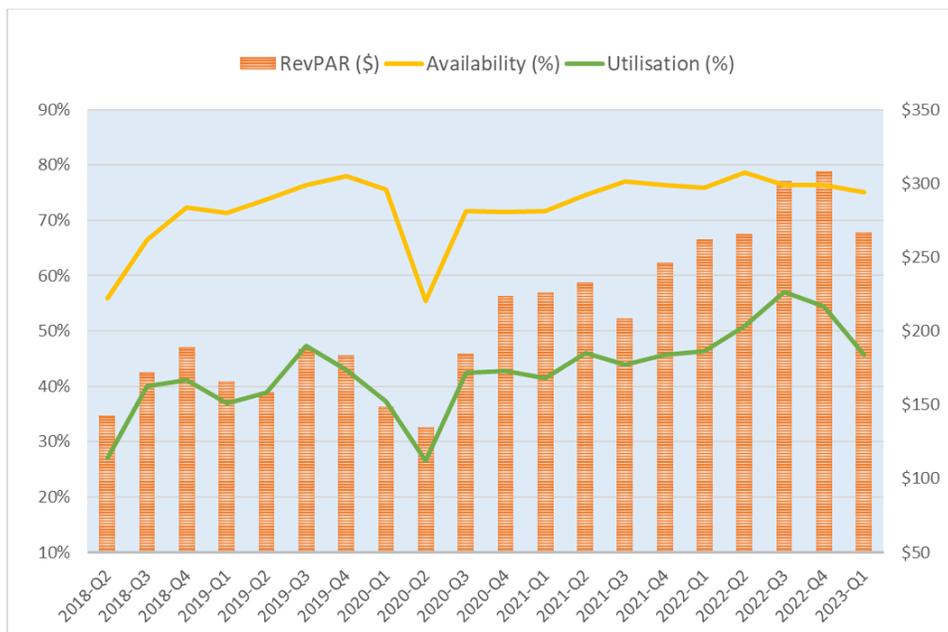
Figure 3b. Availability, utilisation, and profitability trends for entire-house STRA (Queensland, Deckard 2023)

Despite the decline in STRA RevPAR, availability, and utilisation during the initial stages of the pandemic, there has been a rebound in availability, utilisation, and profitability, especially since the second half of 2022. The availability of entire-home STRA, on average, is about 80%, with an average utilisation rate of 60% for apartments and 50% for houses. As a comparison, the occupancy rate for an average Queensland hotel room was 64% in January 2023 (+6.6% as compared to January 2022) in the most

recent Queensland Accommodation Report (Tourism & Events Queensland, 2023). The utilisation of an active entire-home STRA is comparable to an average hotel room in Queensland.

During peak travel season (2022-Q4), the average RevPAR surpasses $300/night for an entire-house STRA and almost $300 for an entire-apartment STRA, suggesting a strong seasonal element tied to the coincidence of summer and school holidays. As a comparison, the RevPAR for an average Queensland hotel room was $191 in January 2023 (a +$38.5 compared to January 2022), according to the most recent Queensland Accommodation Report (Tourism & Events Queensland, 2023). There is potentially a revenue premium for active STRAs compared to hotel rooms.

Given the comparisons, it is the case that active entire-home STRAs in Queensland are on par with hotel accommodation in terms of occupancy. Our data indicate that there exists a strong financial incentive to operate a STRA in Queensland given the high demand for tourist accommodation.

Regions

While State-level descriptive statistics offer initial insights into broad STRA market trends, pointing to a strong recovery from the Covid-19 pandemic, examining STRA by regions within Queensland provides an understanding of the regional dynamics.

First, we compare the regional composition of active STRAs in 2020-Q1 and 2023-Q1. In Figure 4, we can observe that South East Queensland (SEQ) has the largest regional STRA market (comprising two thirds of the State's STRA dwellings), with major tourism and activity destinations including Brisbane, the Gold Coast, and the Sunshine Coast. The STRA market has recovered to its pre-pandemic level in all regions except for Far North Queensland, where international arrivals have only partly recovered.
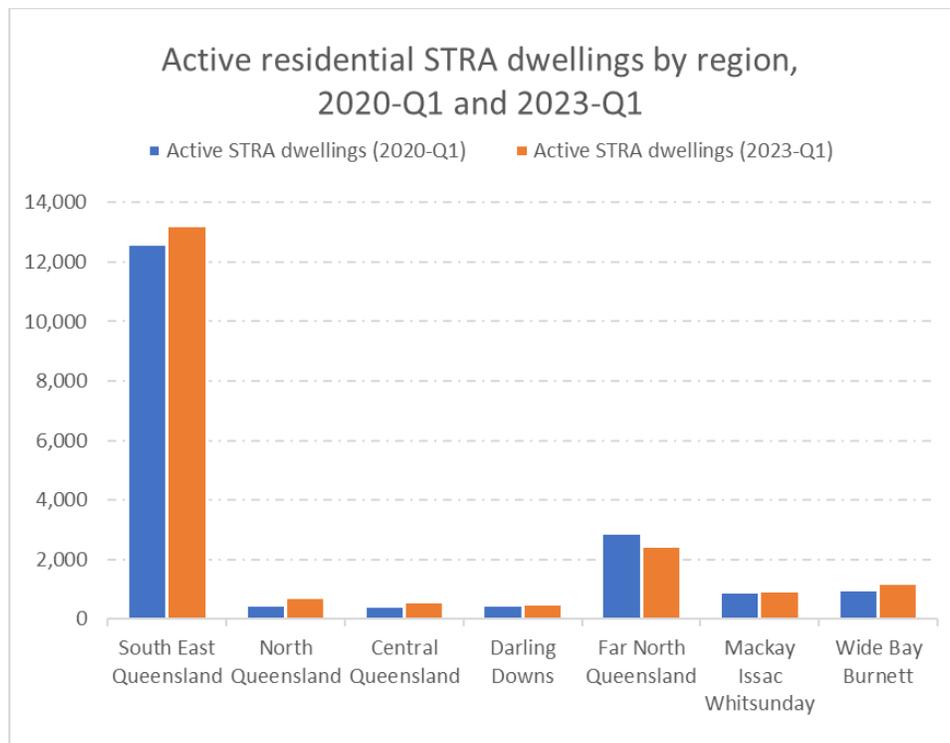
Figure 4. Regional active residential STRA dwellings in 2020-Q1 and 2023-Q1 (Queensland, Deckard 2023)

Next, we compare the proportion of active STRA dwellings in all residential dwellings by region. The results are visualised in Figure 5. When factored in the regional distribution of residential dwelling stock, STRA dwellings only occupy a small proportion of all dwellings in SEQ. The proportion is highest in Far North Queensland (including Cairns), which is 2.1 per cent.
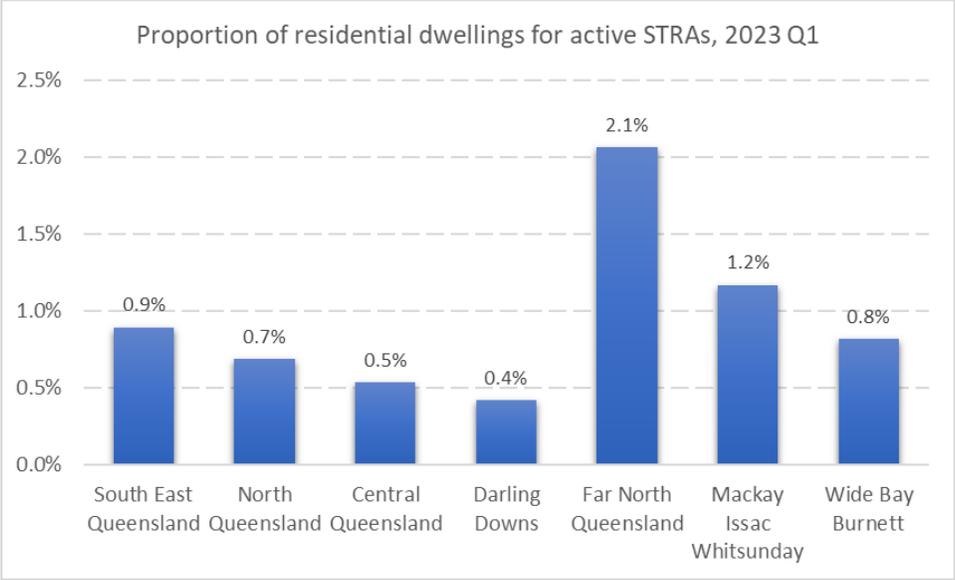
Figure 5. The proportion of residential dwellings for active STRA in 2023-Q1 by region[7] (Queensland, Deckard 2023)

In terms of the proportion of permanent STRA in all residential dwellings, Far North Queensland (mostly Cairns) has a much higher proportion of residential dwellings that could potentially have been used exclusively for STRAs, although the figure equates to less than 1.5 per cent (Figure 6)

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[7] The estimation is based on Queensland's average housing dwelling stock in 2021 using the ABS data. Therefore, the estimation is subject to errors in the other reporting years.
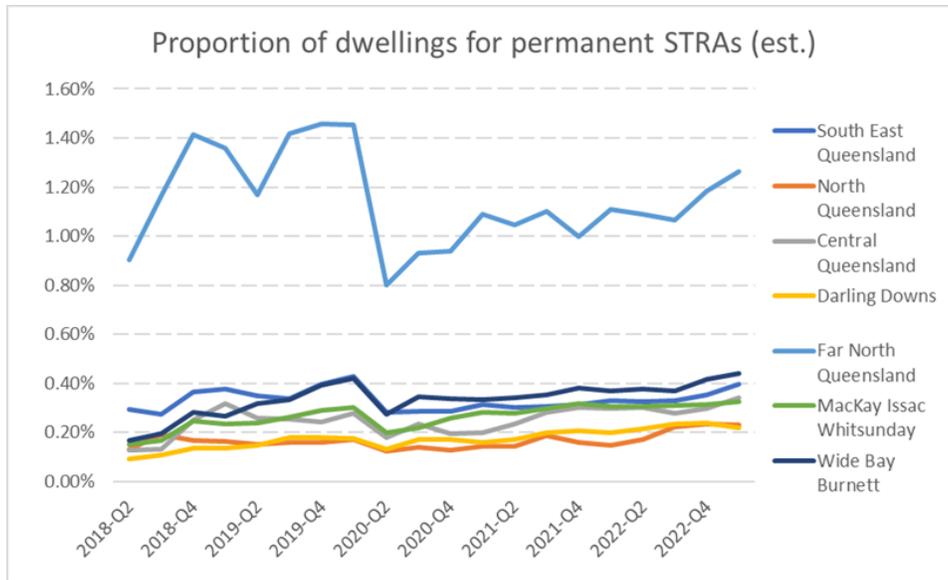
Figure 6. Time trends of the proportion of residential dwellings for permanent STRA by region (Queensland, Deckard 2023)

When examining the availability (Figure 7), utilisation (Figure 8), and profitability (Figure 9) time series trends for active entire-house STRA listings by region, we find greater variability in all three metrics among the more popular regions for tourism (e.g., Mackay-Issac-Whitsunday, Far North Queensland, and South East Queensland) versus the less popular regions for tourism (e.g., Central Queensland and North Queensland), especially in late 2022 and early 2023. The trends for entire-apartment STRA listings are similar.
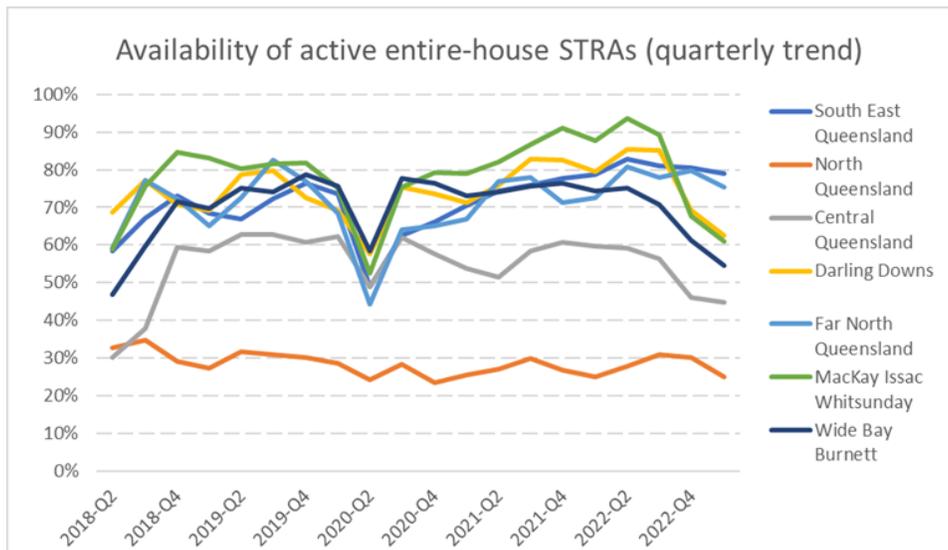
Figure 7. Time trends of the availability of active entire-house listings STRA by region (Queensland, Deckard 2023)
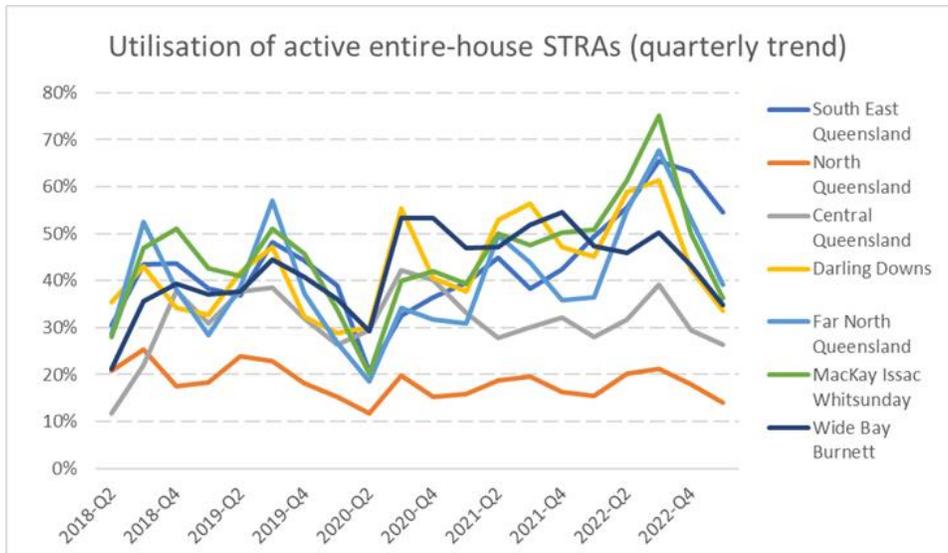
Figure 8. Time trends of the utilisation of active entire-house STRA listings by region (Queensland, Deckard 2023)
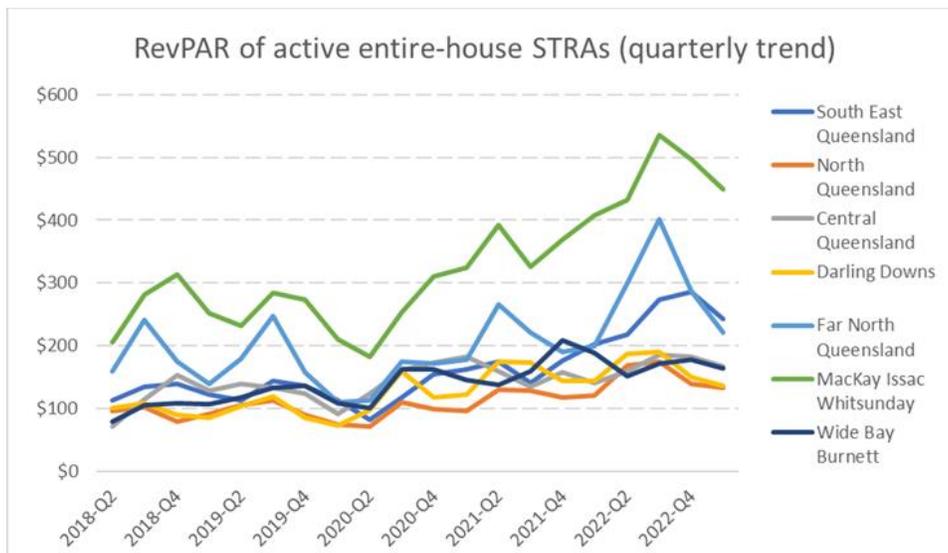
Figure 9. Time trends of the profitability of active entire-house STRA listings by region (Queensland, Deckard 2023)

Overall, the regional breakdown suggests that although the absolute number of STRA is higher in South East Queensland, relative numbers vary greatly. Availability and utilisation are typically higher in urbanised areas, while revenue is highest in tourism-oriented areas such as the Mackay-Isaac-Whitsunday region. On the other hand, the proportion of permanent STRA is highest in Far North Queensland, suggesting that STRA fill a market gap tied to a lack of more formal temporary and permanent accommodation such as hotels. The statistics describing the regional patterns strongly indicate that STRA businesses seek 'tree-change' and 'sea-change' locations arguably related to

emerging trends in tourism and migration. This dynamic is important for planners, policymakers, and practitioners to closely monitor the STRA markets in high-demand tourism regions.

Local Government Areas (LGAs)

Examining STRA at the LGA scale reveals a substantial presence of STRA listings in the most densely populated coastal and coast-adjacent regions in Queensland. In summary, the top LGAs ranked by STRA availability include the Gold Coast, the Sunshine Coast, Brisbane, Noosa, Douglas, Whitsunday, Cairns, Moreton Bay, and Townsville. These can be crudely divided into two types: major cities with relatively steady demand for short- and medium-term accommodation (e.g., Brisbane, Gladstone, Moreton Bay, Townsville) and LGAs economically dependent on tourism (e.g., Noosa, Douglas). The Gold Coast and the Sunshine Coast likely fall somewhere between these two types.

Using the most recent quarterly data in 2023-Q1, active listings, active dwellings, and permanent dwellings across LGAs are first summarised in Figure 10. The single largest STRA market is the Gold Coast, with in excess of 7,313 active listings, which translates into 4,514 active residential dwellings for STRA (almost 2,000 of which are classified as 'permanent' STRA dwellings), followed by the Sunshine Coast (4,793 active listings), Brisbane (3,650 active listings), Noosa (2,968 active listings) and Douglas (1,378 active listings).
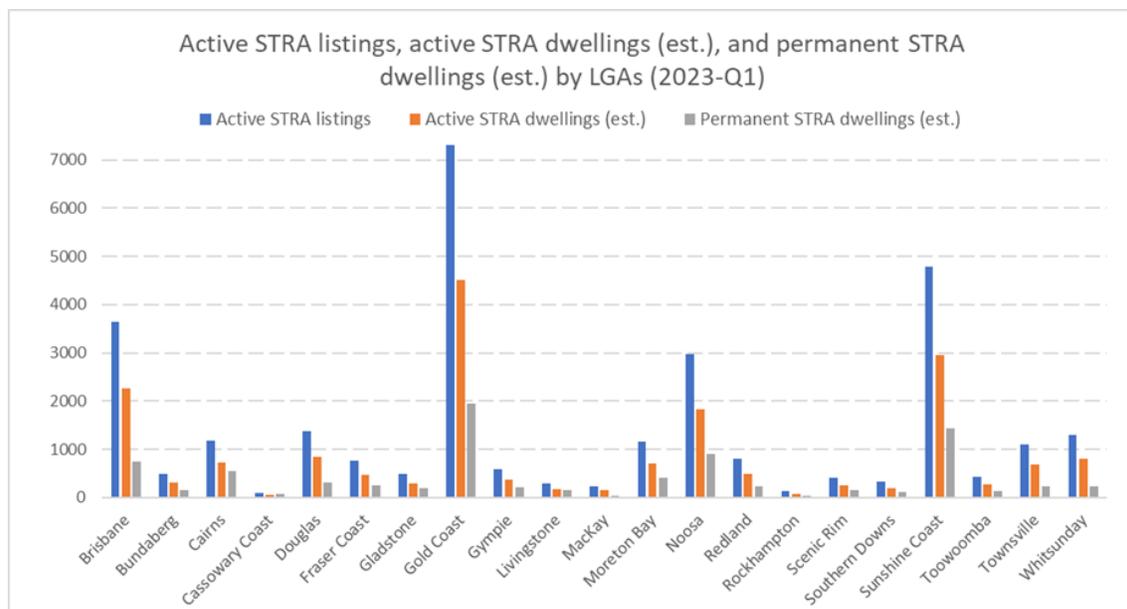
Figure 10. The number of active listings, dwellings, and permanent dwellings for STRA by LGA in 2023-Q1 (Queensland, Deckard 2023)

Normalised by the total number of residential dwellings within each LGA, we visualise the proportions of active and permanent dwellings for STRAs (2023-Q1) in Figure 11 and Figure 12, respectively.
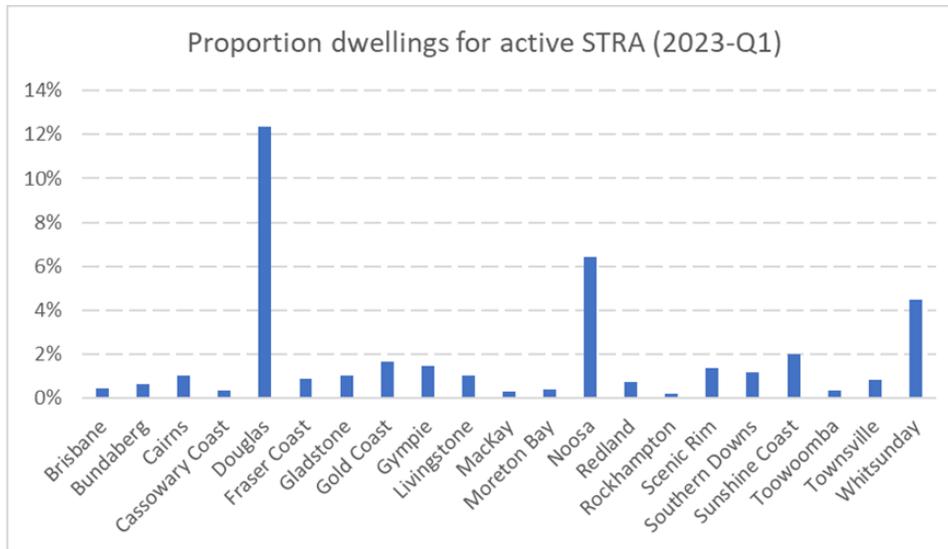
Figure 11. The proportion of residential dwellings for active STRA by LGA in 2023-Q1 (Queensland, Deckard 2023)
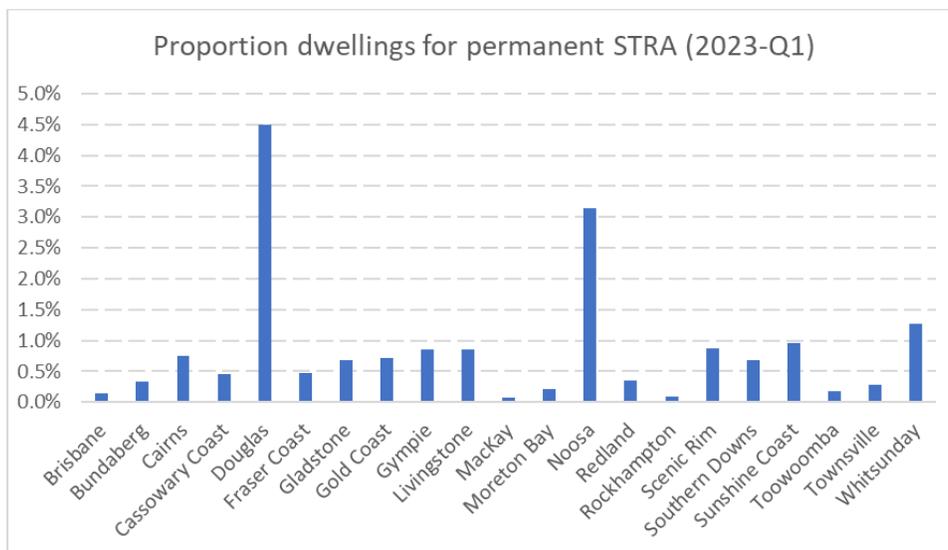
Figure 12. The proportion of residential dwellings for permanent STRA by LGA in 2023-Q1 (Queensland, Deckard 2023)

In relative terms, Douglas, Noosa, and Whitsunday have the highest shares of residential dwellings potentially used for active STRA or permanent STRA activities. Particularly in Douglas it is estimated that more than 10% of residential dwellings can been used for active STRA activities. About 4.5% of residential dwellings can be used for STRA on a permanent basis. These statistics are 6% and 3% for Noosa and 4% and 1.2% for Whitsunday. On the other hand, there exists a relatively small impact by STRA on the overall residential dwelling stock in Brisbane, the Gold Coast, and the Sunshine Coast.

Case of Noosa

We summarised the number of active STRA dwellings by listing type in different suburbs in Noosa Shire Council. In Noosa, entire STRA houses and apartments comprise 97% of all 1921 active STRA dwellings,

according to the 2023-Q1 Deckard data. Furthermore, the suburb-level permanent STRA dwellings are half of all active STRA dwellings, based on Deckard's definition of permanent STRA dwellings (1,001/1,921 dwellings). We calculated the percentage of permanent STRA dwellings in all residential dwellings (data provided in the Noosa Monitoring Report) by suburb. They are listed in the row highlighted in blue. Percentage-wise, it is the highest in Sunshine Beach (9.5%), followed by Noosa Heads (7.7%), Peregian Beach (5.0%), and Castaways Beach (4.4%). Comparing the statistics with those provided in the Noosa Council Monitoring Report ('Noosa Report' for short)

Table 2. STRA dwellings in suburbs of the Noosa Shire Council (Deckard 2023-Q1 & Noosa Council Monitoring Report)

Active STRA Dwellings by Listing Type (Deckard)	Suburbs in Nooosa									Grand Total
	Castaways Beach	Marcus Beach	Noosa Heads	Noosa Hinterland	Noosaville	Peregian Beach	Sunrise Beach	Sunshine Beach	Tewantin	
Entire Apartment	4	1	422	11	173	48	31	161	17	867
Entire House	25	17	215	133	142	127	78	138	24	898
Entire Other	2	4	15	41	9	7	6	6	2	93
Partial Apartment	0	0	1	0	2	1	1	1	1	6
Partial House	0	1	9	15	6	2	4	1	4	42
Partial Other	0	0	2	10	1	0	1	0	1	15
Total Active STRA Dwellings (Deckard 2023-Q1)	30	23	664	210	333	184	120	308	49	1921
Total Permanent STRA Dwellings (Deckard 2023-Q1)	14	6	357	109	175	90	57	173	20	1001
Total Residential Dwellings (Noosa Report)	307	377	4654	7864	5012	1790	1736	1827	4570	28218
% Permanent STRA Dwellings	4.4%	1.6%	7.7%	1.4%	3.5%	5.0%	3.3%	9.5%	0.4%	3.5%
Total Dwellings Used for STA (Noosa Report)	30	39	2078	115	1349	370	166	518	89	4753
% residential rated dwellings used for STA or HH (Noosa Report)	10%	10%	45%	1%	27%	21%	10%	28%	2%	17%

We note that the total number of dwellings used for STA ('short-term accommodation') provided within the Noosa Report (Page 38) is much lower than those provided by Deckard data (active or permanent). There are several plausible explanations for the discrepancy between the two data sources:

1. Deckard data only counts the number of active and permanent STRA dwellings on a quarterly basis. This means that seasonally operated STRA dwellings may not be counted across a calendar year. We recognise that the quarterly trends are stable for the two metrics (active and permanent STRA dwellings), meaning that between different quarters of a calendar year there are no dramatic differences in the two metrics.
2. The Noosa Report use data dated back to early 2020 therefore capturing a period before the onset of Covid-19 impacting the tourism and accommodation sections. The STRA market landscape has been reshaped by the pandemic.
3. The Noosa Report only exclude hotel-, motel-, cabin-, or retreat-style accommodation when counting the inventory of STRA dwellings. Professionally managed commercial holiday homes are included. For Deckard data, only residential dwellings (excluding bed-n-breakfast, hotel, etc.) from the popular STRA platforms (e.g., Airbnb, VRBO, Booking.com) are counted.

Impact of STRA on housing supply and rental affordability

This section provides analyses of the impact of STRA and housing supply on rental affordability. The analysis draws on both descriptive as well as econometric modelling techniques. Several data sources are used in the analysis to test the robustness of the results.

Rental Affordability for Single Income Individuals and Households

Rental affordability is typically measured as the ratio of expenditures on rent to earned income in per cent terms. This is the definition adopted here and we specifically measure **rental affordability** as follows:

$$RentalAffordability_{D,LGA,t} = \frac{Annual\ Expenditure\ on\ Rent_{D,LGA,t}}{Total\ Personal\ Income} \times 100 \quad Eq(1)$$

where,

D= Houses, Units

LGA = Local Government Area

t = year

Rental Affordability$_{D,LGA,t}$ per cent. The measure is computed for D= Houses, Units, and each year *t*=2016,…,2022.

Annual Expenditure on Rent: computed from the *listed weekly median rent* at Statistical Area Level 2 and averaged across the SA2s in the corresponding LGA for year *t*. The expenditure is computed from the most affordable SA2s for the LGA[8]

Total Personal Income: Australian Bureau of Statistics (ABS), Total personal income - median ($), by Statistical Area Level 2 (2015-16 to 2019-20) and averaged across the SA2s in the corresponding LGA. Income for each SA2 for years 2020-2021 and 2021-2022 has been assumed to continue to growth at the same rate of that observed for the 2015-16 to 2019-20 period.

As the computed *% Rental Affordability* is based on personal income figures, they provide an indication of the rental affordability of single income households or singles living on their own. *The figures can be interpreted as providing a picture of the rental affordability of the most vulnerable households in the community*.

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[8] For each LGA the mean, minimum and maximum of SA2's rental affordability was computed. The minimum per cent has been used to define "most affordable."

Rental Affordability and Dwellings Used for STRA – Visualisation

Figure 13 presents the computed *% Rental Affordability* using the formula in eq1 for the LGAs Brisbane, Gold Coast, Sunshine Coast, Noosa, Douglas and Whitsunday (Appendix 3 of the report provides high-definition versions of these graphs). In addition, the plots   include the *% Dwellings used for STRA* for the corresponding LGAs. As indicated above, these per cent rental affordability figures are for the **most affordable** suburbs (SA2s) in each LGA. Rental affordability for Houses is in blue and the figure for Units is in orange. These are graphed for the years 2016 to 2022. The per cent of dwellings dedicated to STRA is depicted in grey, for the years 2018 to 2023 using the data provided by Deckard. Deckard has indicated the figures for 2023 are based on the first quarter and the listings for the second quarter known at 1st April 2023. The graphs also mark the 30% level with a red line. Rental affordability above 30% is considered as an indicator of rental stress. In this case, it is implying that a *single income family* would be spending more than 30% of their income in rent, and thus it provides a visual indication of rental stress across these LGAs

Some for the findings from the descriptive analysis are:

- Rental affordability of houses and units within the most affordable areas of Brisbane and Douglas are at similar levels. In Brisbane they have remained at the same levels over the period 2016-2022. Douglas's rental affordability of detached houses and units have both worsened in 2021 and 2022 from pre-pandemic levels (10.34% over 2019 levels).
- Rental affordability in the Gold Coast showed a relatively constant level over the period 2016-2021. Detached houses are less affordable than units (about 8% on average). The rental affordability of both types of housing worsened in 2022. Between 2021 and 2022, affordability decreased by 10% for houses and 5% for units (12% and 7.4%, respectively in 2022 over 2019 levels)
- Noosa has the least rental affordability of all LGAs considered. Houses have been historically less affordable than units (up to 40% in some periods, at around 19% in 2022). However, this might simply be a reflection of the composition of the housing stock in this LGA. Similar to Douglas, rental affordability has decreased since 2021 for both houses and units. For Noosa, houses were 14% less affordable and units 18% less affordable in 2022 than they were in 2021 (22.35% and 24.80%, respectively in 2022 over 2019 levels).
- The Sunshine Coast shows rental affordability of houses had been relatively steady since 2016 but worsen by 9% between 2021 and2022 (13.10% over 2019 levels).   The rental affordability of units has increased post-pandemic (2021 onwards). Units were in 2022 30% more affordable than they were in 2020. It would be interesting to follow the progress. This could be an indication of changes in preferences for type of housing post pandemic. However, there is no data available at this point to explore this possibility.
- Whitsunday has the highest rental affordability of all LGAs considered in this section. Houses have been less affordable than units and that continues to be the case. Rental affordability was worst in 2019, but those levels decreased in 2020 for houses and have this far not returned to pre-pandemic levels. For units the levels have been relatively stable around a comfortable 20%.

- There does not appear to be a clear pattern of increase in the per cent of dwellings used for STRA over the observed period of 2018 to 2023.
    - *Douglas* showed a decreased in the per cent of dwellings that were used for STRA during the COVID pandemic, and the per cent is now close to the pre-pandemic level (13.08% in 2018, 12.28% in 2023).
    - *Noosa* is the only LGA that shows a steady increasing trend from 3.64% in 2018 to 6.34% in 2023.
    - *Other LGAs*: The per cent of dwellings used for STRA is below 5%.

The findings from this descriptive analysis are:

- Rental affordability has been in what is considered to be the region of "under stress" for the most vulnerable households (single income) over the period studied (2016-2022) in Brisbane, Gold Coast, Sunshine Coast, Noosa and Douglas.
- Rental affordability by 2022 had decreased over 2019 figures for houses in the Gold Coast (12%), the Sunshine Coast (13.10%), Noosa (22.35%) and Douglas (10.34%). The remained steady for Brisbane and Whitsunday.
- Rental affordability by 2022 had decreased over 2019 figures for units in the Gold Coast (7.4%), Noosa (24.80%) and Douglas (10.34%). They remained steady for Brisbane and Whitsunday, and increased for the Sunshine Coast (59%).
- There is no evidence of a generalised increase in the proportion of dwellings that are used for STRA at the LGA levels.

In the next section the study presents analyses at the suburb (SA2) level data to provide a deeper analysis of the relationship between STRA and its impact on rents.
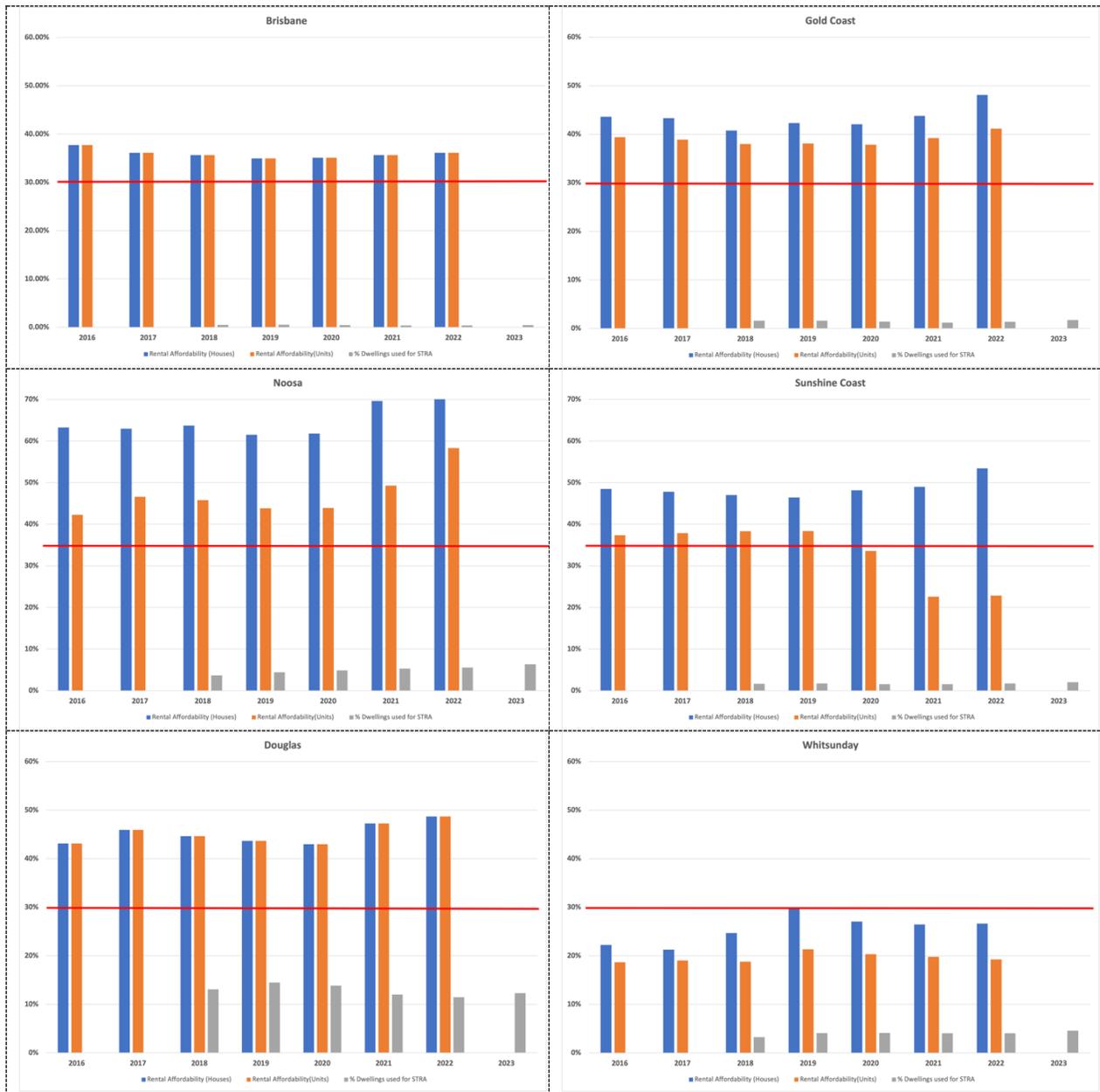
Figure 13. Rent Affordability and % Dwellings Used for STRA[9] for Selected LGAs, in Queensland [see Appendix 3 for higher definition versions].

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[9] The data provided by Deckard on the % of Dwellings Used for STRA covers the period 2018 to 2023 Q1.

Rental Increase and % of Dwellings in STRA for Selected LGAs in Queensland

In this section the study provides a spatial visualisation of the increase in rent prices since 2019 as of the first quarter of 2023. The increases in rental prices are computed using Corelogic's Hedonic Rental Index. These figures are shown with an overlay of the percent of dwellings in STRA. The rental increases for units and houses are shown on separate maps. Figure 14 presents the spatial visualisation for Brisbane and the Gold Coast and Figure 15 presents the visualisation for Noosa, Sunshine Coast, Douglas and Whitsunday.

The figures provide a clear indication of the extent of rent price increases across suburbs within each LGA. The lighter shaded areas represent locales where rental increases are in the range of 19% to 25% and the darkest shaded areas represent locales where the rental increases are in the range, 40%-50%. The percent of dwellings in STRA is marked by the graduated bubbles with the largest bubble denoting a percent of 10% -25% for a given suburb (SA2) (Appendix 3 of the report contains high-definition and larger versions of the middle and right panels of these figures for each region)

> The key finding from this exercise is that there is no clear alignment between the suburbs where rents increases have been the highest and the percentage of dwellings devoted to STRA.

In the next section the report presents the findings from econometric modelling conducted at the LGA and SA2 levels of geographic granularity.
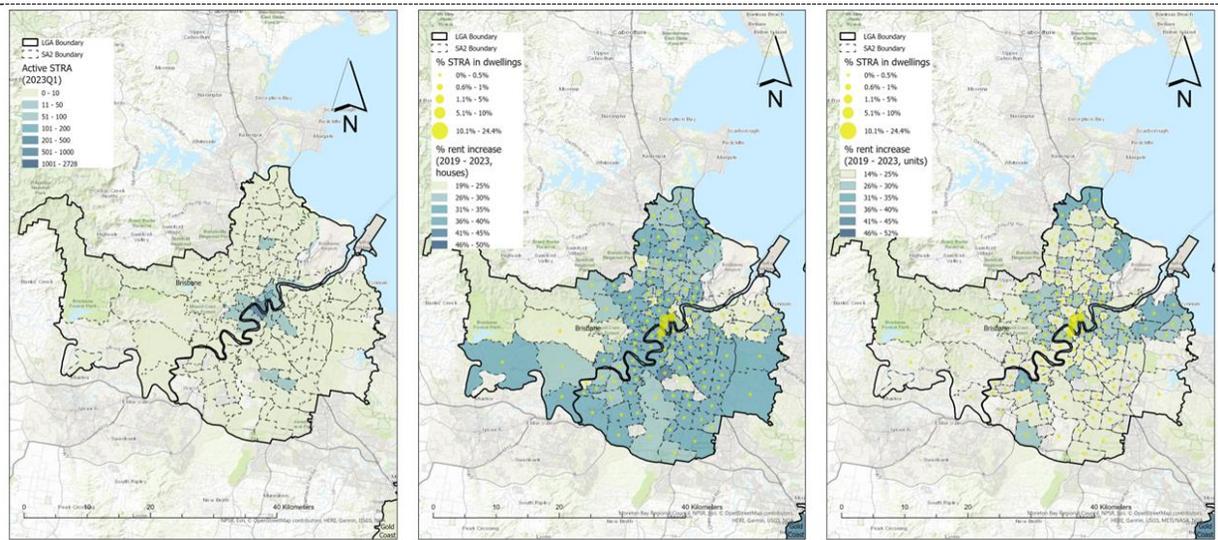
Brisbane: Suburb-level active STRA listings in 2023Q1 (left), percentage residential dwellings for active STRA in 2023Q1 overlaying percentage rent increase for houses, 2019-2023 (middle), and percentage residential dwellings for active STRA in 2023 Q1 overlaying percentage rent increase in for units, 2019-2023 (right)
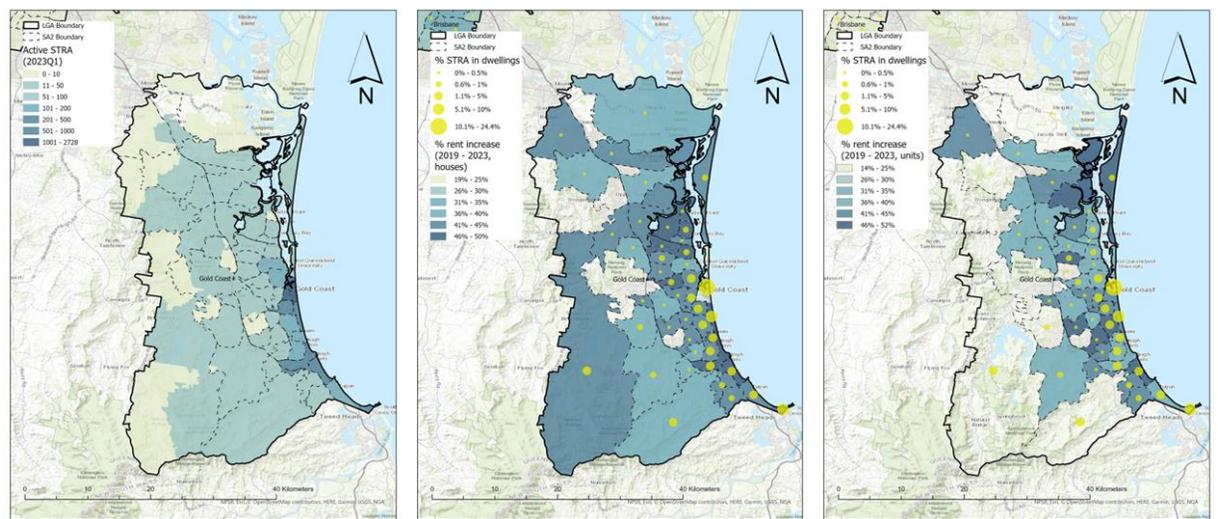
Gold Coast: Suburb-level active STRA listings in 2023Q1 (left), percentage residential dwellings for active STRA in 2023Q1 overlaying percentage rent increase for houses, 2019-2023 (middle), and percentage residential dwellings for active STRA in 2023 Q1 overlaying percentage rent increase in for units, 2019-2023 (right)

Figure 14. Brisbane and Gold Coast LGAs. LEFT: Suburb- level STRA Listings in 2023 Q1: MIDDLE AND RIGHT: Percentage of Residential Dwellings in Active STRA in 2023Q1 overlaying rental increase for 2023Q1 since 2019 (houses middle, units right) [see Appendix 3 for higher definition versions]
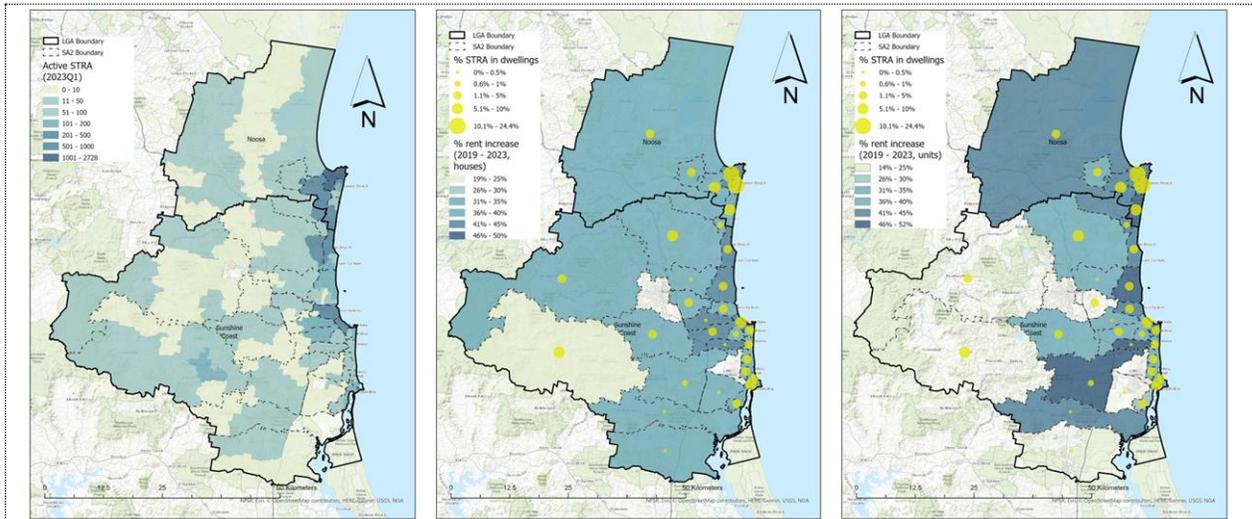
Noosa & Sunshine Coast: Suburb-level active STRA listings in 2023Q1 (left), percentage residential dwellings for active STRA in 2023Q1 overlaying percentage rent increase for houses 2019-2023 (middle), and percentage residential dwellings for active STRA in 2023Q1 overlaying percentage rent increase for units 2019-2023 (right)
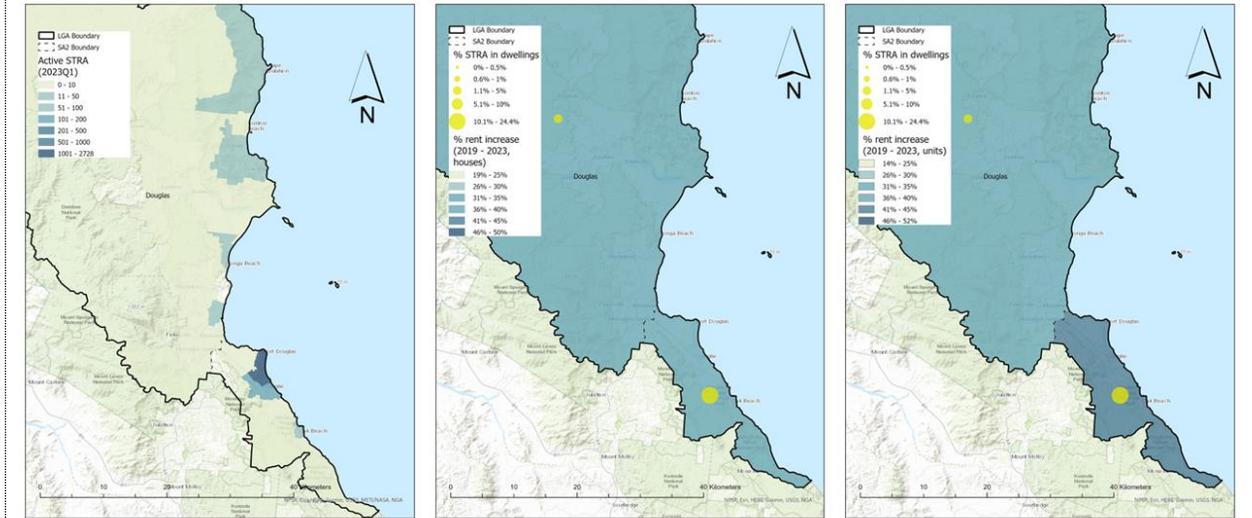
Douglas: Suburb-level active STRA listings in 2023Q1 (left), percentage residential dwellings for active STRA in 2023Q1 overlaying percentage rent increase for houses, 2019-2023 (middle), and percentage residential dwellings for active STRA in 2023 Q1 overlaying percentage rent increase in for units, 2019-2023 (right)
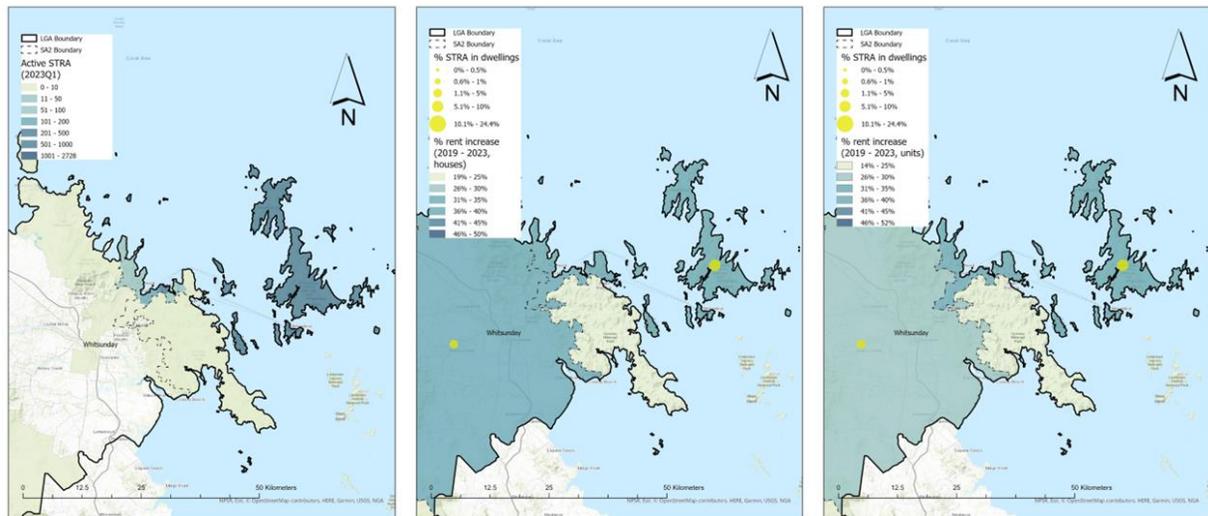
Whitsunday: Suburb-level active STRA listings in 2023Q1 (left), percentage residential dwellings for active STRA in 2023Q1 overlaying percentage rent increase for houses, 2019-2023 (middle), and percentage residential dwellings for active STRA in 2023 Q1 overlaying percentage rent increase in for units, 2019-2023 (right)

Figure 15. Noosa and Sunshine Coast, Douglas, Whitsunday LGAs. LEFT: Suburb- level STRA Listings in 2023 Q1; MIDDLE AND RIGHT: Residential Dwellings in Active STRA in 2023Q1 overlaying rental increase for 2023Q1 since 2019 (houses middle, units right)

[see Appendix 3 for higher definition versions]

Findings from Econometric Modelling

The following modelling was conducted (detailed tables with the econometric estimations can be found in the Appendix 2 of the report),

1) Modelling of the effects on Rent Prices of STRA listings and Dwelling Stocks, for houses and units, for all of Queensland and a subset of six LGAs, at SA2 granularity for the period 2016 – 2022. This modelling is based on the proposed model by Almagro, M. and T. Dominguez-Iino (2022), which they implemented for the city of Amsterdam.
2) Sensitivity of results to the measure of rent prices. Two sources of data are used: APM SA2 Median Listing Rent Prices (APM), and Corelogic SA2 Median Price AVM (Corelogic).
3) Sensitivity of results to the measure of STRA Listings. Two sources of data are used: AirDNA SA2 listings for the period 2016-2022, Deckard LGA listings for the period 2018-2023Q1.
4) Sensitivity of results over the COVID period.
5) Testing of the effectiveness of a change in STRA regulation introduced by Noosa in 2022 using AirDNA and Deckard data.

Four models have been estimated for the analyses in 1) to 3) above:

a) Base Model: The model explains rental prices as a function of STRA Listings, Dwelling Stocks, Median Income and the Proportion of high-skilled population in each region (SA2). All variables are log-transformed. The base model does not include controls for time or region.
b) Model 1: Identical to the base but with controls for time periods.

c) Model 2: Identical to the base but controlling for time and region (SA2), expected to be the best fitting model.
d) Model 3: Model 2 but removing the STRA listing to test the sensitivity of the findings.

Table A2 shows the results for houses and units separately and for the two measures of rents (based on APM and Corelogic), respectively for the sample of all SA2s in Queensland over the period 2016-2022. Deckard data was not available at this level of granularity and with a state-wide coverage. Thus, STRA total listings are from AirDNA data for this part of the modelling. Using the statistical measures of BIC and LogLik "Model 2" is selected over the "Base Model" and "Model 1".

The key findings from the modelling for Queensland are consistent with those found by Almagro and Dominguez-Iino (2022) and Barron et al. (2021) are as follows:

- For houses,
  - STRA total listings have had a minimal impact on rent prices. Using APM data it is estimated that a 1% increase in the total listings would lead to a 0.02% increase on rents (on average) while using Corelogic there is no significant impact (on average).
  - Removing STRA total listings from the model (Model 3), results in a small loss of explanatory power by the model and no significant change on the estimated effect of other factors.
  - Dwelling stocks are statistically significant in explaining rent prices. The models indicate (depending on source of data) that an increase of 1% in the stock of dwellings can be expected to provide between 0.10% and 0.20% reduction in rent prices (on average) else equal.
- For units,
  - STRA total listings have a 0.03 % (using APM data) / 0.04% (using Corelogic data) impact on rent prices on average over the sample period as a result of a 1% increase in total listings.
  - Dwelling stocks are statistically significant in explaining rent prices. As in the case of houses, and depending on data source, an increase of 1% in the stock of dwellings can be expected to provide between 0.14% and 0.20% reduction in rent prices (on average) else equal.

Table A3 presents the results for the same models for the sample of all SA2s in six selected LGAs (Brisbane, Gold Coast, Sunshine Coast, Noosa, Douglas, Whitsunday) over the period 2016-2022. Models are also conducted separately for houses and units and the two measures of rents (APM and Corelogic). Using the statistical measures of BIC and LogLik "Model 2" is selected over the base and "Model 1".

The key findings from the modelling are as follows:

- For houses,
  - STRA total listings do not have a clear impact on prices. Using APM data the estimate indicates a 1% increase in total listings would lead to a 0.05% (Model 2) increase on

rents (on average); however, no statistically significant impact is found when using Corelogic data.

- o Removing STRA total listings from the model (Model 3) results in a small loss of explanatory power by the model and not significant change on the effect of other factors.
- o Dwelling stocks are statistically significant in explaining rent prices. However, the estimates of the effects are wider in size across data sources and models. The estimates (depending on source of data) are that an increase of 1% in the stock of dwellings can be expected to provide between 0.06% and 0.24% reduction in rent prices (on average) else equal.

- For units,
  - o STRA total listings increasing by 1% show a contribution to an increase in rent prices of 0.0% (using APM) and 8% (using Corelogic)
  - o Removing STRA total listings from the model (Model 3) results in a small loss of explanatory power by the model and a significant change on the effect of other factors (such as dwelling stocks)
  - o Dwellings stocks are statistically significant in explaining rent prices in Model 2 but not in Model 3. The effect on rent prices implied by Model 2 is modest, indicating a 1% increase in dwelling stocks can be expected to provide a reduction in rent prices of 0.08% to 0.12%. Model 3 indicates they are not statistically significant in reducing rent prices.

The analyses for points 4) and 5) are presented in Tables A4-A6.

The models in Table A4 are modified versions of Model 2 to test the effect of COVID (Models 4 and 5) on rent prices for houses and units, respectively. The same combination of data is used in that APM and Corelogic rent prices are used to compare. Model 6 is designed to test further the relative importance of STRA total listings. Here it is assumed that STRA total listings dropped to zero during the COVID pandemic period (2020 and 2021), while they were at the observed levels for the remaining of the sample period.

The main results from this part of the analysis are:

- For houses,
  - o STRA total listings increasing by 1% is estimated to have an impact in the order of 0.05% on rent prices and this is consistent across both sources of rent price data. (Model 4)
  - o The COVID period had a small but additional positive effect on rental prices over that in non-COVID years.
  - o The experiment of assuming STRA total listings dropped to zero during the 2020-2021, leads to the conclusion that STRA total listings have had no significant effect on prices (Model 6) on average over the 2016-2022 period.

- For units,

- o The evidence of the COVID period effect on rent prices is positive; however, it is not significant when using Corelogic rent prices.
- o The COVID period has had a small but positive effect on rental prices over that in the non-COVID years.
- o The experiment of assuming STRA total listings dropped to zero during the 2020-2021, leads to the conclusion that STRA total listings have none or very marginal (in statistical terms) effect on rent prices (Model 6).

The key findings from this analysis are
- Consistent with the findings for other jurisdictions around the world. STRA is a small contributor in explaining rent prices. The contribution typically in the range of 0.02% – 0.05% resulting from a 1% increase in total STRA total listings.
- Dwelling stocks[10] are a major contributor in explaining rent prices. The contribution expected on average to range in the region of 0.10% to 0.20% reduction on rent prices resulting from an increase in the total dwelling stocks of 1%.

These models do not imply causation.

The Case of a Change in Regulation by Noosa

Econometric evaluation of causal effects are possible if some jurisdictions introduce new regulation or changes in policy. These types of studies rely on observing both the time period before and after the change as well as both jurisdictions that did not introduce the changes as they are needed as the "control sample". Tables A5 and A6 present modelling to evaluate the effectiveness that a change in regulation introduced by Noosa in 2022 for STRA has had on rent prices (as measured by APM and Corelogic, respectively).

The Noosa Regulatory Setting:

Under the Noosa Plan 2006, legal definitions of things like "detached house", "visitor accommodation", "multiple housing"...etc were loosely defined or were not fit for purpose for the boom of short-term accommodation. People were able to exploit these definitions to let out granny flats and detached houses as short-term accommodation. New local laws beginning on 1st Feb 2022, reworked some of these definitions and expanded zoning along with different "codes" that need to be assessed depending on where the property for rental is located. Exceptions are given to those who can show short-term accommodation (STA) activity prior to these new laws, to continue STA, but these are granted on a case-by-case basis and called "existing use rights". So now, depending on which zone a property is located will determine what kind of restrictions apply. To continue STA every year, the approval is subject to

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[10] This result is based on the econometric modelling conducted at an SA2 level of granularity. The only available data to use was total counts of dwelling stocks by each SA2 in the state. There was no data available to distinguish attached and detached housing. Statewide models as well as a subsample of SA2s in Brisbane, Gold and Sunshine Coasts, Noosa, Douglas and Whitsunday were run. The results are robust.

annual renewal (Please refer to Regulation Table attached to Stage 3 of this Report for additional information).

The models are estimated with data at the SA2 level of aggregation (Table A4) with AirDNA total listings data and at the LGA level of aggregation (Table A5) with Deckard total listings data. The technique used for this modelling is known as Difference-in-Difference (DiD) and it is designed to test the effect of policy interventions. In the current setting the "treatment" to be studied is defined as follows:

1) Treated Period: 2022-2023Q1
2) Treated LGA: Noosa
3) Control LGAs: Brisbane, Gold Coast, Sunshine Coast, Douglas, Whitsunday
4) Pre-treatment period: 2016-2019 (when using AirDNA data) and 2018-2019 (when using Deckard data). To avoid the confounding effect of COVID the years 2020 and 2021 are not included in the estimation.

The key findings from this testing are that there is no indication that the regulation has had any statistically significant effect to date on rental prices. A marginally significant (positive effect) on rental prices of houses is found when using APM sourced rent prices. However, given the short timeframe and lack of uniformity of results across models and sources of data, this result is not considered robust.

Economic Contribution of STRA

Key findings

Industry provided estimates suggest a large economic benefit from STRA. However, international studies evaluating the impact of STRA suggest that such estimates tend to be large relative to the benefits received.

A clear benefit of STRA goes to landlords who can now more effectively diversify into the short-term rental market.

Benefits also accrue to travellers, who now potentially have a greater choice of rental accommodation that may also be more affordable and better suited to their needs.

More accommodation options might facilitate more visitors or potential longer stays in a region creating larger economic benefits.

It is noted that not all travellers using STRA are tourists. Other important categories of users include people staying near hospitals for medical treatments, people relocating from interstate or overseas, and workers on temporary job assignments.

STRA offer local residents a form of home business to assist with housing cost. This is particularly true of hosted stays.

STRA have been shown to support additional small business, particularly those offering services to short-stay visitors such as cafes, restaurants, laundromats, convenience stores, etc.

STRA-related businesses may also support entrepreneurial activities in regions with historically fewer such opportunities.

Neighbourhood change related to STRA may also displace businesses catering to longer-stay residents. These may include car repair services, dental clinics, and other services that short-stay visitors are unlikely to use.

There is international evidence to suggest that STRA impacts hotel performance. However, higher quality hotels and chain hotels are found to be less affected by STRA.

This section of the report reviews the estimated economic impacts of STRA as documented in industry and academic journals. Specific estimates of the contribution of Airbnb to the Queensland economy was presented in submissions to the Tourism Industry Reference Panel by Airbnb. They estimated that the visitors using the platform spent $1.6 bn in 2019, which supported 16,500 jobs in the hospitality sector. Further evidence presented a contribution to Gross State Product of $1.85 bn. To examine such claims, we now consider the impacts from STRA on local communities and businesses that have been established in the academic literature. This section also discusses the direct economic impact on the hotel sector and reviews the broader amenity and urban impacts arising from STRA.

Assessing the Economic impact of STRA

A report by Bivens (2019) outlines the challenges of assessing the economic costs and benefits of STRA. As stated in the report, many of the large, well-known companies that operate in this market exist as an

online marketplace that charge a brokerage fee on short-term rental accommodation. The establishment of these online marketplaces provided a more efficient means for landlords to offer their property on a short-term basis. Prior to this, unless properties were in a traditional holiday/resort location with a readily established infrastructure to manage short-term rentals, the only option available to landlords was to rent the property on a long-term lease or leave the property vacant for use as a second home.

A clear benefit of STRA goes to landlords who can now more effectively diversify into the short-term rental market. Benefits also accrue to travellers, who now potentially have a greater choice of rental accommodation that may also be more affordable and better suited to their needs. It is important to note that at this point that not all travellers using STRA are tourists. Anecdotal evidence from Brisbane shows that in addition to the traditional recreation traveller, many people coming to Brisbane from rural Queensland for medical treatment look at STRA options located close to medical facilities. Also, job seekers relocating to Queensland from interstate or overseas often first stay in STRA accommodation while they look for longer-term accommodation options. Workers on temporary job assignments are also users of STR and the STRA market offers accommodation options that are not well supplied by traditional hotels.

Another well-documented benefit to the economy from STRA is the economic activity from the visitors using STRA that might not have otherwise occurred if these trips had not taken place. More accommodation options might facilitate more visitors or potential longer stays in a region.

Potential costs or negative impacts identified by Bivens (2019) include higher housing costs if the displacement of long-term residential dwellings by STRA is taking place. However, it is noted in the section above that in the case of Queensland, these impacts appear very low relative to other drivers of rental costs. In some jurisdictions, there may be a negative impact on the local tax base if visitor taxes are not properly collected. This is not the case in Queensland, but such taxes are common in many other countries.

Other potential costs include amenity externalities arising from STRA and this is discussed in more detail below.

Finally, the potential negative impact on hotels needs to be considered from increased competition from STRA and the next section discusses this in detail.

Impact on hotels:
One measure of the significance and strong growth prospects of STRA providers in the accommodation sector is the stock performance of the major hotel groups. As of 2 June, 2023, the market capitalization of Airbnb Inc was $71.7bn USD ($109 bn AUD) on annual earnings of $6m. This market valuation is significantly higher than long-established hotel operating companies and compares to $52.1bn USD market capitalization ($79.2bn AUD) for Marriot International Inc on earnings of $996m, $36.4bn USD market capitalization ($55bn AUD) for Hilton Hotels Corporation on earnings of $535m, and $11.6bn USD ($17.6bn AUD) for Hyatt Hotels Corporation on earnings of $174m. It is clear from the values that investors are placing on companies like Airbnb, that there is a significant expectation of the importance and permanence of the sector as an important part of the hotel and accommodation industry.

The academic evidence of the impact of STRA on the hotel sector shows there are important effects, but these effects are very dependent on the segment of the market and the nature of the location in which the hotel operates. In one of the first studies to estimate the financial impact of STRA on hotels, Zervas et al (2017) finds that in Texas a 10% increase in the size of the STRA market reduced hotel revenue by 0.39%. Given the repaid growth in the size of the market, this suggests a revenue decline of the order of 8-10% in the most competitive areas of the state. The authors also find that in the short run the hotels responded by decreasing room prices. In further analysis, the authors found that hotels in the budget or economy price tier were more impacted than upscale or luxury hotels, that hotels that lacked conference facilities were also more impacted, and that independent hotels were more impacted than chain hotels. This last finding has important implications for the Australian hotel sector. Historically regional areas have more of a history of small, independent hotels, however Australian cities do not, meaning most of the hotel rooms, e.g. in Brisbane, are contained within large tower-like hotels presenting a semi-homogenous product, which might be preferred by some types of travellers (eg Business travel).

The findings about high-quality hotels being less impacted by STRA is mirrored in Guttentag and Smith 2017, Hajibaba and Dolnicar 2017. Finally, they show that the flexible capacity to accommodation stocks from STRA can reduce the pricing power of hotels during peak times.

Dogru, et al (2020) studied four international cities to examine the impact of STRA on hotel financial performance. They find that a 1% increase in Airbnb listings decreases hotel RevPAR by between 0.016-0.031% across four major international cities (Tokyo, Paris, Sydney, and London). They found no impact on the ADR and the authors suggest that their finding implies that hotels are not adjusting pricing to deal with competition from STRA but they are seeing an impact on occupancy.

Other aspects of STRA experience for visitors is that STRA accommodation is seen to provide more services than hotels, hence, travellers staying more than three nights might prefer STRA. Such amenities include: laundry facilities; kitchens; television with streaming services; wardrobes and storage; outdoor areas; parking.

STRA are typically price-dynamic, insofar as the daily rate changes in direct proportion to demand. The nightly rate for hotels is often set in advance, and by season, so is less dynamic and demand-responsive (though this is changing). Further, STRA provide configurations that hotels often lack, for example additional bedrooms, a living room, or easy access to car parking. This may be useful for elderly or disabled guests.

Amenity Impacts

This section reviews recent findings on the impacts of STRA beyond the direct economic impacts discussed in the sections above. The review covers many of the key issues raised in public enquiries held in Australia and summarises findings from international studies. Many of these issues relate to public nuisance, building safety concerns, or the creation of negative impacts on local communities. However, it is noted that not all amenity impacts are negative and there are well-documented positive spillovers associated with STRA on local communities.

Australian Evidence

In Australia, there have been two major public inquiries into the impact of STRA. NSW held a public inquiry over the period of 2015-2017. This covered the early years of the operation of Airbnb in Australia and occurred against a background of initial concerns about how the negative spillover impacts associated with STRA were being managed. It is noted that Airbnb only began operations in Australia in 2012 (Deloitte Access Economics 2017), so the NSW inquiry reflects some of the early concerns with little regulatory oversight. Another major public inquiry occurred in Western Australia in 2018-2019. The results of the inquiry and a summary of key concerns were published by Pforr et al (2021). This study lists several major amenity impacts arising from an increase in STRA documented from prior studies. These amenity impacts include:

Negative:

- Parking and excessive noise from traffic (Dolnicar 2018, Cheng et al 2020)
- Potential for properties or districts to be degraded by parties and/or careless behaviour
- Landscape of neighbourhoods (Hajibaba and Dolnicar 2017)
- Potential for harm caused by poor fire safety standards or other occupational hazards
- Overcrowding, higher living costs, loss of atmosphere (von der Heidt et al 2019)

Positive:

- STRA contributes to the economy of neighbourhoods not normally associated with tourism (Crommelin et al 2018)
- Temporary labour shortages (e.g. nurses, tradespeople) may be easier to address if STRA is available locally
- There is also evidence that being a host creates additional employment opportunities for residents because of low barriers to entry (Dolnicar 2018)
- Visitors in STRA may contribute to urban renewal efforts otherwise difficult to achieve
- Better utilisation of vacant dwellings, for example when hosts are on holiday or not occupying holiday homes
- Tenants require short-term accommodation for time intervals that often fall outside conventional six- or twelve-month leases
- Hotels lack the facilities of short-term accommodation, including a kitchen, washer & dryer, and additional space for work and/or other activities

Pforr et al (2021) further discuss the Western Australian experience and summarises the themes founds in public submissions to the inquiry. They note concerns focused on disturbances, monitoring and registration issues, concerns over safety, taxation issues and relative changes in return on investments.

Several concerns were also expressed over consumer protection and unfair competition as STRA might be perceived as avoiding compliance with industry standards. Alongside these business practice concerns, were additional concerns about job security. This was driven by the use of part-time or casual work arrangements in the STRA sector along with a perceived lack of enforceable workplace safety and employment security.

The key negative amenity and disturbance impacts noted by Pforr et al (2021) in the submissions to the WA Parliamentary Inquiry were identified as

- Noise
- Local public services strained due to increase in tourists
- Security concerns
- Neighbour privacy
- Strata access (lifts, gates)
- Neighbours have no voice re commercial use
- Parking availability and accessibility
- Foot/car traffic increase in residential areas

Summarising the WA experience, Pforr et al state:

> *Critics also suggested that short-term rentals in residential areas can cause serious social issues, disturbing neighbours and community members. This includes noise, privacy infringements, lack of awareness and caution with security protocols, as well as issues with parking access and availability. Local public services were said to be potentially strained due to an increased presence of tourists in residential areas. Submissions to the Western Australian Parliament Inquiry written by community members and local councils stated that private home rentals in residential and family focused areas have triggered complaints and public unrest caused by increased traffic, parking issues, overflowing bins, loss of amenity, noise, and antisocial behaviour. In strata complexes and group dwellings these issues were found to be even greater, with applications contesting improper use of strata apartments for commercial purposes involving lengthy and bureaucratic processes. Some respondents link the occurrence of such problems to scenarios where there is no connection with the host as the homeowner lives offsite or the property is managed by a third party. Ultimately, a number of submissions highlighted that unregulated short-term rentals do not take the opinion of the local residential community into consideration, who may not be in accordance with the short-term rental practices in their neighbourhood. (p 87)*

Queensland Experience

The experience in Queensland mirrors findings from other Australian states. One of the most detailed studies is found in the Noosa monitoring report and subsequent studies related to regulatory changes in this region. An evaluation by consultants, The AEC Group, noted the amenity impacts arising from short-term accommodation in Noosa (Report for Noosa Shire Council, September 2021, p2):

• Lack of regulation and enforcement.

• Lack of local complaints management and resolution.

• Number of guests and overcrowding.

• Frequency and turnover of guests.

• Noise disturbances.

• Times and type of use of outdoor space.

• Waste disposal and waste management.

• Number of vehicles and parking.

• Safety and security.

• Pet nuisance management.

• Conflict between permanent residents and visitors.

These impacts can be grouped into neighbourhood impacts (regulation, complaints management, noise, parking) and building-level impacts (overcrowding, frequency and turnover of guests, waste, parking, conflicts)

In a recent high-profile court case, the issue of amenity impacts featured heavily in the ruling of Spice Apartments Residential Management Pty Ltd ATF SARM Trust v Brisbane City Council [2023] QPEC 2 (see https://www.queenslandjudgments.com.au/caselaw/qpec/2023/2). The ruling in the case points to the conflicts that may exist in strata-title communities where some of the properties are used for short-term rental accommodation. Mirroring the amenity impacts noted by the AEC Group in the context of Noosa, the ruling stated (paragraph [9]):

> *These impacts arise from both the conduct of guests of lots used for Short-term accommodation in the buildings and the services required to service this use. Firstly, there are impacts on vehicular access and parking facilities which include congestion on the driveway and in the car park, and Short-term accommodation guests parking in visitor car parks or car parks not assigned to them. This use of the land also results in such guests loitering in the reception areas with their baggage. It results in hallways being clogged with cleaning trolleys and temporary beds, which also causes damage the walls. It results in the blocking of garbage disposal infrastructure. This use also results in the pool area being regularly utilised for large, rowdy parties.*

Further, Judge Everson endorses the concern that damage and usage to common areas may be materially higher when compared to usage for long-term residents. (paragraph 10)

> *I am satisfied on the facts before me that the conducting of the Short-term accommodation use by the applicant has resulted in not only a material intensification of the use of the common property but also damage to the common property in a way that is unlikely to have occurred had this use not been (apparently unlawfully) conducted on the land. It is the Short-term accommodation use that attracts people in large numbers who bring luggage, and require clean linen for a brief period. They are the people who may require extra beds in their units during their stay. They appear to regularly include individuals who do not care where they park, how much noise they make and whether they upset residents of the buildings. They are, on the evidence before me, a demographic regularly looking for a good time, in circumstances where they are not staying for a long time.*

Amenity impacts and STRA considerations are even more nuanced in the context of strata or community-title complexes. It is noted that body corporates operate under the Body Corporate and Community Management Act 1997 and a full review of this legislation and potential mechanisms for dealing with amenity impacts in strata title communities is beyond the scope of this study. This is noted as a potential area for further study and evaluation.

Against this backdrop of specific amenity concerns another stream of literature has explored the structural impact of a city from an increase in STRA. This structural change in a city occurs because the spending patterns of tourists or short-term visitors can be quite different from that of local permanent residents.

Studies have found that retail spending by STRA visitors can enhance profits for local operators, but that this may be at the expense of businesses geared toward long-term residents (Alamagro and Domiguez-Lino, 2022; Hidalgo, Riccaboni, Velazquez 2023). Examples may include more expensive and fashionable cafes replacing local eateries, or boutiques replacing barbershops and more longstanding businesses. This often benefits local populations, who themselves gain better access to high-amenity services, though it may favour younger populations over older ones. Several academic studies have referred to this process as Airbnb-led gentrification, suggesting that an influx of more affluent residents changes the neighbourhood character (Robertson et al., 2022). However, a survey of this literature suggests that this is constrained largely to cities with large volumes of tourists (often in Europe) with significantly large housing budgets than locals.

Research has shown that STRA has had mixed impacts on amenity, particular notable in coastal communities in which the impacts are relatively significant. Muschter et al. (2022) cite four positive, eight negative and seven mixed impacts of STRA on the community. The primary positive impacts were increased revenue for locals, increased employment for locals, and increased retail opportunities. The primary negative impacts were housing affordability, parking and waste management. The primary mixed impacts were income for hosts and property investors, greater diversity of local accommodation, and an increase in visitors.

Regulatory approaches to STRA International and Australian evidence

Key findings

The international evidence presented shows that regulatory frameworks often encompass requirements for hosts to obtain a permit or register their properties to ensure compliance with regulations and zoning requirements.

In areas heavily impacted by STRA, international regulations often encompass one or several of the following restrictions: guest limits, limits on the number of days for unhosted visits in a year, limits on the number of permitted STRA properties in a region, tools for residents to share concerns about negative amenity impacts (eg noise complaints), large fines for unregistered STRA bookings.

Another feature of global regulatory practices is that it is usually concentrated and implemented at a city or regional level to deal with city-specific concerns.

The approach to STRA regulation in Australia mirrors international practice with examples of other states or cities outside of Queensland using registration systems, distinguishing between hosted and non-hosted STRA, and in some regions implementing daily limits for STRA.

In Queensland, the legislation pertaining to short-term rental accommodation (STRA) depends on the location of the property. Local councils can regulate STRA under their local planning laws which are usually outlined in the relevant town planning scheme or city plans.

In Queensland there has been a recent trend for local governments to regulate STRA through increasing rates for properties that engage in STRA. For example, Brisbane City Council, Noosa Shire Council and Sunshine Coast Council have introduced a new general rate category, "transitory accommodation". Council may also require STRA landlords to obtain a development approval for their dwelling if used for STRA.

Summary

This section of the study presents a discussion of international and Australian evidence relating to regulatory approaches to STRA. The report then focuses on key recommendations for consideration by the Queensland Government in balancing the benefits of STRA against potential limitations and community concerns. The recommendations have been framed against a background of significant public concern about the impact of STRA on the rental market.

The analysis in Stage 1 and 2 of this review puts forward quite clearly that the impact of STRA on the rental market in Queensland is likely to be small, if at all. There is no doubt that the key issue driving rental market disruption in the state is a limited supply of dwellings in the face of strong demand for accommodation. It appears that where rental stock has been removed from the market it is much more likely that a home has been purchased by an owner-occupier than to be used for STRA.

While beyond the scope of this report to discuss measures of housing supply, it is the view of the authors of this report that the most beneficial measures to support the rental market all relate to measures designed to support increasing housing supply.

The findings of Stage 1 and 2 of this review do point to areas of significant STRA "hotspots" that may be altering the previous usage of dwellings in concentrated areas.

International Evidence

Regulatory frameworks often encompass requirements for hosts to obtain a permit or register their properties to ensure compliance with regulations and zoning requirements. This allows for cities to monitor and track STRA activity. In some instances, new zoning requirements are introduced specifically to provide for STRA.

In areas heavily impacted by STRA, regulations include elements of the following (see von Briel and Dolnicar 2021):

Guest limits (limits on the number of guests per property).

Limits on the maximum number of days for unhosted visits in a year. Common restrictions observed usually reference 90, 120 or 180-day limits. However, in extreme cases, cities such as Honolulu (in some areas) and Santa Monica impose a 30-day annual limit.

> *Minimum Nights per Stay* (Lower Bounds) are imposed to discourage 'very short' stays of less than one week. The primary appeal of this approach is to reduce competition between the hotel sector and the STRA sector. Moreover, this approach recognises that many STRA occupants, are in fact staying for more than a week or two, and thus helps formalise STRA as 'in-between' distinguished from hotels (shorter stays) and long-term rentals. It has been suggested, however, that STRA are complementary, rather than competitors to hotels given the product that is differentiated both typologically (e.g. houses, shared rooms) and geographically (e.g. suburbs with no hotels infrastructure).

> *Maximum Nights per Year* (Upper Bounds, or Caps) are imposed to persuade landlords to 'return' STRA to the long-term market. The logic is that a cap makes STRA less lucrative to owners (hosts) than a steady 6- or 12-month lease given the large number of untenanted nights. In reality, however, there are several issues with caps. First, there is no 'magic number' supported by empirical evidence. Various numbers have been trialled (e.g. 180 nights, 90 nights) but have been decried as arbitrary. Second, there is evidence that hosts use work-arounds to circumvent rules, for example by making multiple listings. A recent study found that despite rules in New York City restricting unhosted stays, there remain 10,000 'illegal' Airbnb listings citywide (Olapido, 2023). Third, and most importantly, there is limited evidence to suggest that these would improve outcomes.

In many cases hosted visits are not restricted or if the rented space represents a small fraction of the size of the overall property (for example a studio or granny flat). These regulations often state the hosting must take place at the primary residence of the host and that may be defined by a requirement to live at that site for a certain number of days per year.

Facilitation with booking platforms to collect tourist tax

Neighbourhood tools to share concerns from local residents (eg noise complaints)

Limits on the allowable number of properties operating as STRA through a permit system.

Paris requires that hosts who convert residential properties to unhosted STRA which is rented more than 120 days annually must register this as a commercial property. They are then required to purchase and convert commercial property of the same floor area into residential property.

In many cases, there is significant evidence of illegal or unregulated STRA activity in major tourist-focused cities (von Briel and Dolnicar 2021), which often requires monitoring by city authorities and co-operation of the booking platform to restrict bookings to only registered properties.

Another feature of global regulatory practices is that it is usually concentrated and implemented at a city or regional level to deal with city-specific concerns.

Approaches to Short Term Rental Accommodation Regulation in Australia

Short term rental of a family home or an investment property has become a source of additional income for many and serves as an alternative option for those in need of temporary accommodation. With the emergence of digital platforms such as Airbnb, Stayz, Booking.com etc, the barriers to entry have been reduced and hosts are able to connect to potential renters and arrange bookings with ease. This increased activity in the market of short-term rentals raises some issues, particularly for existing residents and businesses surrounding properties in which short term renting is taking place. The scale, turn over and how in which the activity is conducted should not impact the existing community. A balance of safety, impact to existing residents, social and economic benefit needs to be met. In Australia, different states and territories approach these issues in different ways. Below is an outline of the approaches taken by Queensland and New South Wales.

NSW experience
New South Wales (NSW) takes a state-wide regulatory framework approach to STRA which consists of three components:

- A planning framework
- Fire safety standards for STRA
- Government-run STRA Register

The planning framework (effective 1 November 2021) is complemented by a mandatory Code of Conduct. Under the framework, STRA is defined as:

> *Short-term rental accommodation means a dwelling used by the host to provide accommodation in the dwelling on a commercial basis for a temporary or short-term period.*

and additionally, introduces "Hosted-STRA" and "Non-hosted STRA". The primary distinction between the two are day limits, which are the limits on the number of days that a property can be used for non-hosted STRA. For hosted- STRA, these are not restricted by any day limits and can be carried out 365 days per year. For non-hosted STRA, this can be restricted to a maximum of 180 days a year in the following areas:

- Greater Sydney region
- Ballina area
- Certain land in the Clarence Valley area
- Certain land in the Muswellbrook area

All other LGAs, non-hosted STRA may take place 365 days a year, with the exception if where the booking is for 21 or more consecutive days, the booking will not count towards the day limits.

The mandatory Code of Conduct sets out the rights and obligations of everyone who participates in STRA, provides resolution of disputes and complaints, outlines compliance, enforcement and oversight of the STRA industry. Broadly, it covers how hosts should behave (for example, providing accurate information to guests about premise, complaints, emergency plumbing, electrical and Australia emergency services and informing neighbours of STRA activity), how guests should behave (for example noise and disruption to neighbours and other occupants of the premise) and booking platforms (ensuring properties listed are registered with NSW).

The second component, fire safety standards, aim to strike a balance between safety requirements and costs to implement. It spells out what safety measures are required for each type of dwelling. Whilst the third component, STRA register, ensures compliance with the rules and fire safety standards. It enables monitoring of compliance with day limits as well as streamlining this with booking platforms such as (AirBnB and Booking.com)

Current Approaches to STRA Regulation in Queensland

In Queensland, the legislation pertaining to short-term rental accommodation (STRA) depends on the location of the property. Local councils can regulate STRA under their local planning laws which are usually outlined in the relevant town planning scheme or city plans. Local councils may wish to distinguish STRA activity into a hosted home-based business activity or a non-hosted STRA activity (for example, an entire dwelling used for STRA), in which case, these can be assessable under different sections of the planning scheme. Appendix 4 contains an extensive summary of the assessments Brisbane, Gold Coast, Douglas, Whitsundays, Sunshine Coast, Noosa, Redlands councils have taken to regulating STRA in their communities.

Typically, the planning scheme will also state what sort of use is permitted in certain zones, which can include whether short-term accommodation is consistent use. Planning schemes can also contain a specific code dedicated to short-term accommodation that further outlines requirements that need to be met in order STRA activity commence and continue. We refer to Brisbane City Council as an example, where in the Brisbane City Plan, Section 9.3.22 is the short-term accommodation code dedicated to objectives needed for STRA activity.

In addition, local councils can regulate STRA through increasing rates for properties that engage in STRA. Four councils mentioned previously, Brisbane City Council, Noosa Shire Council and Sunshine Coast Council have introduced a new general rate category, "transitory accommodation". The new rating category allows local councils to capture premises that are used as temporary residence for paying guests and require different rates to be paid, outlined in the relevant schedule of fees and charges of the local council.

The Brisbane city council distinguishes hosted-STRA as a home-based business which is assessable under a different category in the City Plan than unhosted STRA (e.g. the entire dwelling used for STRA). Such a use is treated as Short Term Accommodation and requires a development approval. From 1 July 2022, the council also imposed a 50% increase in rates for such properties. The council notes that Short-term accommodation is primarily supported in centre zones or located near tourist, cultural or shopping and leisure facilities. There are no public notification requirements for the application process for sites in centre zones, higher density residential areas and in some low-medium density areas located on arterial or suburban roads (https://www.brisbane.qld.gov.au/planning-and-building/planning-guidelines-and-tools/brisbane-city-plan-2014/supporting-information/holiday-and-short-term-rentals). As the rates increase is very recent, it has not been possible to determine if it has had any impact on the STRA at this point in time. In addition, if the STRA activity is of the entire dwelling or unit, then generally a Material Change of Use (MCU) application is also required. However, unlike other councils (see below) the strategy for fees and charges are based on physical area that is assessable. A base fee of $4992 for an area of 50m^2 is incurred and additional fee of $512 per 100m^2 is incurred. For larger scale operation of STRA, we refer to the Brisbane City Council's schedule of fees and charges for 22-23.

In contrast, Gold Coast have not followed Brisbane, Noosa and Sunshine Coast in using property rates to regulate STRA. However, if the property engaging in STRA activity is not the primary residency of the host and they are not living there throughout the year, then an application for a MCU is needed. This

captures properties where Gold Coast is at most their secondary residence. Under this scenario, a large majority of the zones where STRA activity is assessable (whether it is code or impact assessable), will require an application for an MCU. In Appendix 4, Gold Coast, will outline which zones are code or impact assessable for STRA activity. We refer to the schedule of fees and charges of the City of Gold Coast for the specifics, especially for large scale operation of STRA, but for zones where code assessment is needed, the 22-23 fee is $7138, whilst for impact assessment, is $9513, for those wishing to list 10 or less beds or rooms. The approval of the MCU application is then decided by the Gold Coast City Council and only upon approval can SRRA take place.

Douglas Shire Council also follows a similar approach as the Gold Coast, whereby an application for a MCU is needed (for both when code or impact assessable). We refer to the Douglas Shire Council's schedule of fees and charges for specifics, but their fee structure varies from the Gold Coast. Using 22-23 fees and charges, a base application fee of $1471 (includes application for 2 rooms/unit) is required and additional fees thereafter if more than 2 rooms/unit are to be let out. Rooms and units are distinguished by the council, additional rooms (above base) will incur $155 per room, whilst units incur $445 per unit up to 50 units and additional units beyond 50 will incur $223. A simplified base plus per unit strategy is used by Whitsunday and Redland councils, with Whitsunday further distinguishing fees based on code or impact assessment. Sunshine Coast uses a simplified base plus per room strategy. Reference for specific amounts can be found in the local council's schedule of fees and charges.

In the case of Noosa Shire Council, separate approval is required to commence and continue STRA and is subject to annual renewal. Commencing on 1 February 2022, all existing and new properties that conduct STRA activities must submit a one-off application (unless exempt) to the Noosa Shire Council. The application fee can be found in the schedule of fees and charges. The approval allows the council to additionally impose regulation of STRA. For example, the approval should be displayed at the front of the property along with approval number and a 24/7 complaints hotline number. The nominated person of contact also has specific requirements, such as residing within 20km radius of the premise and responding within 30 minutes of receipt of notification of complaint. For further details, please see Noosa Shire Council Administration (Amendment) Subordinate Local Law (No. 1) 2021.

Acknowledgements

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Appendix 1: Summary Statistics of STRA

Table A1. Summary statistics of STRA at the state, region, and LGA levels for 2023 Q1

	Active STRA listings*	Active STRA dwellings	% residential dwellings for active STRA	Permanent STRA dwellings	% residential dwellings for permanent STRA
State					
Queensland	32,033	19,773	0.9%	11,393	0.5%
Region					
South East Queensland	21,423	13,224	0.9%	5,879	0.4%
North Queensland	1,159	715	0.7%	239	0.2%
Central Queensland	908	560	0.5%	358	0.3%
Darling Downs	827	510	0.4%	265	0.2%
Far North Queensland	3,946	2,436	2.1%	1,493	1.3%
Mackay Issac Whitsunday	1,536	948	1.2%	263	0.3%
Wide Bay Burnett	1,918	1,184	0.8%	638	0.4%
*LGA**					
Brisbane	3,650	2,253	0.4%	736	0.1%
Bundaberg	487	301	0.7%	149	0.3%
Cairns	1,187	733	1.0%	539	0.7%
Cassowary Coast	84	52	0.3%	69	0.5%
Douglas	1,378	851	12.4%	309	4.5%
Fraser Coast	754	465	0.9%	250	0.5%
Gladstone	486	300	1.0%	201	0.7%
Gold Coast	7,313	4,514	1.7%	1,947	0.7%
Gympie	592	365	1.5%	210	0.8%
Livingstone	292	180	1.0%	151	0.8%
MacKay	236	146	0.3%	35	0.1%
Moreton Bay	1,149	709	0.4%	411	0.2%
Noosa	2,968	1,832	6.4%	896	3.1%
Redland	798	493	0.8%	225	0.3%
Rockhampton	127	78	0.2%	35	0.1%
Scenic Rim	413	255	1.4%	161	0.9%
Southern Downs	324	200	1.2%	118	0.7%
Sunshine Coast	4,793	2,959	2.0%	1,425	1.0%
Toowoomba	429	265	0.4%	128	0.2%
Townsville	1,095	676	0.8%	230	0.3%
Whitsunday	1,296	800	4.5%	227	1.3%

* All statistics do not differentiate hosted and non-hosted STRA due to the data limitation

** Due to the sparcity of STRA in the less populated LGAs. Only a number of LGAs have robust reported and estimated statistics.

Appendix 2: Modelling

Applying the Model by Almagro and Domingues-lino (2022)

Table A2: Queensland

Dependent Variable: ln(rent price)

Houses (Full Sample)

Predictors	Base	Model1	Model2	Model3	Base	Model 1	Model2	Model3
ln(Listings)	0.05***	0.06***	0.02***		0.06***	0.06***	0.01	
ln(DwellStock)	-0.01	-0.02	-0.22***	-0.20***	0	-0.01	-0.1***	-0.1***
ln(Median Income)	0.31***	0.27***	0.34***	0.34***	0.33***	0.22***	0.15	0.15
ln(Prop of High-Skilled)	0.29***	0.29***	0.02	0.02	0.32***	0.33***	0.01	0.01
Observations	3740	3740	3740	3740	3347	3347	3347	3347
R-Sq Ad	0.569				0.579			
BIC	-1885.1	-2049.5	-8152.4	-8098.5	-1152.9	-1799.7	-7867.5	-7864
Log.Lik.	967.24	1074.091	6194.613	6163.561	600.781	948.521	5942.4	5936.598
Sample	2016-2022; SA2 QLD				2016-2022; SA2 QLD			
Fixed Effects - Year		Yes	Yes	Yes		Yes	Yes	Yes
Fixed Effects - SA2			Yes	Yes			Yes	Yes

Units (Full Sample)

Predictors	Base	Model1	Model2	Model3	Base	Model 1	Model2	Model3
ln(Listings)	0.03***	0.04***	0.03***		0.04***	0.04***	0.04***	
ln(DwellStock)	0.06***	0.05***	-0.2***	-0.18***	0.06***	0.05*	-0.16***	-0.14***
ln(Median Income)	0.04*	-0.02	0.3***	0.3***	0.03	-0.06	0.28**	0.28**
ln(Prop of High-Skilled)	0.3***	0.29***	-0.02	-0.01	0.32***	0.32***	0.01	0.02
Observations	3080	3080	3080	3080	2799	2799	2799	2799
R-Sq Ad	0.452	0.479	0.959	0.958	0.512	0.576	0.969	0.968

BIC	-902.5	-1008	-5260	-5176.8	-1015	-1361.5	-5344.8	-5201.3
Log.Lik.	475.332	552.176	4461.473	4415.854	531.293	728.347	4398.707	4323.004
Sample	2016-2022; SA2 QLD				2016-2022; SA2 QLD			
Fixed Effects - Year		Yes	Yes	Yes		Yes	Yes	Yes
Fixed Effects - SA2			Yes	Yes			Yes	Yes
Sources	Rents: APM Listing Median Price ; Listings: AirDNA				Rents: Corelogic Median Price AVM; Listings: AirDNA			

Std Errors clustered by LGA; *** Significant at the 1% level ; ** Significant at the 5% level ; * Significant at the 10% level

Table A3: Selected LGAs

Dependent Variable: ln(rent price)

Houses

Predictors	Base	Model1	Model2	Model3	Base	Model 1	Model2	Model3
ln(Listings)	0.07***	0.08***	0.05***		0.08***	0.09***	0.02	
ln(DwellStock)	-0.06***	-0.08***	-0.23***	-0.17***	-0.04**	-0.08***	-0.06*	-0.04*
ln(Median Income)	0.26***	0.19*	0.04	0.01	0.36***	0.23	-0.03	-0.05
ln(Prop of High-Skilled)	0.15***	0.15***	0.12***	0.14***	0.16***	0.15**	0.06**	0.07*
Observations	1568	1568	1568	1568	1458	1458	1458	1458
R-Sq Ad	0.341				0.325			
BIC	-1316.9	-1539.5	-3989.6	-3851.2	-718.7	-1294.7	-3630.3	-3617.8
Log.Lik.	680.539	813.879	2851.940	2779.099	381.213	691.054	2616.492	2606.584
Sample	2016-2022; SA2 for LGAs: Brisbane, Douglas, Gold Coast, Noosa, Sunshine Coast, Whitsunday				2016-2022; SA2 for LGAs: Brisbane, Douglas, Gold Coast, Noosa, Sunshine Coast, Whitsunday			
Fixed Effects - Year		Yes	Yes	Yes		Yes	Yes	Yes
Fixed Effects - SA2			Yes	Yes			Yes	Yes

Units

Predictors	Base	Model1	Model2	Model3	Base	Model 1	Model2	Model3
ln(Listings)	0.023***	0.025***	0.058***		0.04***	0.05***	0.08***	
ln(DwellStock)	0.050***	0.037*	-0.120***	-0.066	0.01	-0.01	-0.08***	-0.01
ln(Median Income)	-0.024	-0.086	0.005	-0.034	0.01	-0.06***	0.18***	0.11
ln(Prop of High-Skilled)	0.113	0.109	0.108***	0.149***	0.13***	0.12***	0.1***	0.16***
Observations	1404	1404	1404	1404	1301	1301	1301	1301
R-Sq Ad	0.136	0.213	0.914	0.906	0.180	0.376	0.953	0.941
BIC	-1139.0	-1227.0	-2842.2	-2730.4	-1025.8	-1338.6	-3312.1	-3033.3
Log.Lik.	591.226	656.981	2207.416	2147.900	534.395	712.322	2387.488	2244.479
Sample	2016-2022; SA2 for LGAs: Brisbane, Douglas, Gold Coast, Noosa, Sunshine Coast, Whitsunday				2016-2022; SA2 for LGAs: Brisbane, Douglas, Gold Coast, Noosa, Sunshine Coast, Whitsunday			
Fixed Effects - Year		Yes	Yes	Yes		Yes	Yes	Yes
Fixed Effects - SA2			Yes	Yes			Yes	Yes
Sources	Rents: APM Listing Median Price ; Listings: AirDNA				Rents: Correlogic Median Price AVM; Listings: AirDNA			

Std Errors clustered by LGA; *** Significant at the 1% level ; ** Significant at the 5% level ; * Significant at the 10% level

Sensitivity Testing

Table A4: Model Sensitive Testing

Dependent Variable: ln(rent price)

	Houses					
Predictors	Model 4	Model5	Model6	Model 4	Model5	Model6
			Listings =0 in 2020-2021			Listings =0 in 2020-2021
ln(Listings)	0.051***	-0.012***	-0.002	0.055***	-0.033	-0.005*
ln(DwellStock)	-0.011	-0.107***	-0.202***	0	0.071**	-0.097***
ln(Median Income)	0.303***	1.221***	0.338***	0.322***	1.934***	0.151

	Model4	Model5	Model6	Model4	Model5	Model6
ln(Prop of High-Skilled)	0.293***	0.098**	0.018	0.324***	0.177***	0.011
COVID Period	0.010*	-0.043***		0.019***	-0.088***	
COVID* ln(Listings)		0.007***			0.01***	
Observations	3740	3740	3740	3347	3347	3347
Fixed Effects	SA2	SA2	Year, SA2	SA2	SA2	Year, SA2
BIC	-1878.8	-6710	-8092	-1150.4	-4385.2	-7876.6
Log.Lik.	968.213	5456.962	6164.435	603.604	4185.043	5946.988

Units

Predictors	Model4	Model5	Model6	Model4	Model5	Model6
			Listings =0 in 2020-2021			*Listings =0 in 2020-2021*
ln(Listings)	0.035**	0	0.005	0.036**	-0.02***	0.01***
ln(DwellStock)	0.055***	-0.117***	-0.181***	0.063***	-0.04	-0.136***
ln(Median Income)	0.035	1.089***	0.292*	0.022	1.451***	0.264*
ln(Prop of High-Skilled)	0.294***	0.055	-0.008	0.323***	0.121***	0.02
COVID Period	0.025***	-0.012		0.012	-0.042***	
COVID* ln(Listings)		0.002			-0.001	
Observations	3080	3080	3080	2799	2799	2799
Fixed Effects	SA2	SA2	Year, SA2	SA2	SA2	Year, SA2
R-Sq Ad	0.454	0.949	0.958	0.513	0.944	0.968
BIC	-903.5	-4656.9	-5178.6	-1008.9	-3681.8	-5240.7
Log.Lik.	479.882	4143.831	4420.734	532.237	3551.348	4346.628
	Sample2016-2022; SA2 QLD			Sample2016-2022; SA2 QLD		
Sources	Rents: APM Listing Median Price ; Listings: AirDNA			Rents: Correlogic Median Price AVM; Listings: AirDNA		

Std Errors clustered by LGA; *** Significant at the 1% level ; ** Significant at the 5% level ; * Significant at the 10% level

Testing Noosa's Regulatory Changes

Table A5: Difference in Difference Regressions: SA2 Level

Dependent Variable: ln(rent price)

Predictors	Houses (DiD)		Units (DiD)	
	Estimates	Estimates	Estimates	Estimates
Y=2022	0.16***	0.29***	0.15***	0.22***
T=Noosa	0.15***	0.2***	-0.01	0.18***
Y=2022 × T=Noosa (Regulation Effect)	**0.14***	0.11	0.17	0.12
Sample - SA2	1120 (2016-2019, 2022)^(a)	1041 (2016-2019, 2022)^(a)	891 (2016-2019, 2022)^(a)	923 (2016-2019, 2022)^(a)
R^2 / R^2 adjusted	0.183 / 0.179	0.348 / 0.344	0.150 / 0.146	0.278 / 0.274
Sources:	APM Median price listings - rents; AirDNA Listings	Corelogic Median Rent AVM; AirDNA Listings	APM Median price listings - rents; AirDNA Listings	Corelogic Median Rent AVM; AirDNA Listings
Noosa Plan 2006 Period	2016-2019 pre-treatment		2016-2019 pre-treatment	
Post Regulation Period (Y)	2022		2022	
Treated (T)	Noosa		Noosa	
Untreated (Control group)	Brisbane, Gold Coast Sushine Coast, Douglas, Whitsunday		Brisbane, Gold Coast Sushine Coast, Douglas, Whitsunday	
^(a)	To avoid confounding with COVID, pre-treatment period is up to 2019		To avoid confounding with COVID, pre-treatment period is up to 2019	

*** Significant at the 1% level ; ** Significant at the 5% level ; * Significant at the 10% level

Table A6: Difference in Difference Regressions: LGA Level

Dependent Variable: ln(rent price)

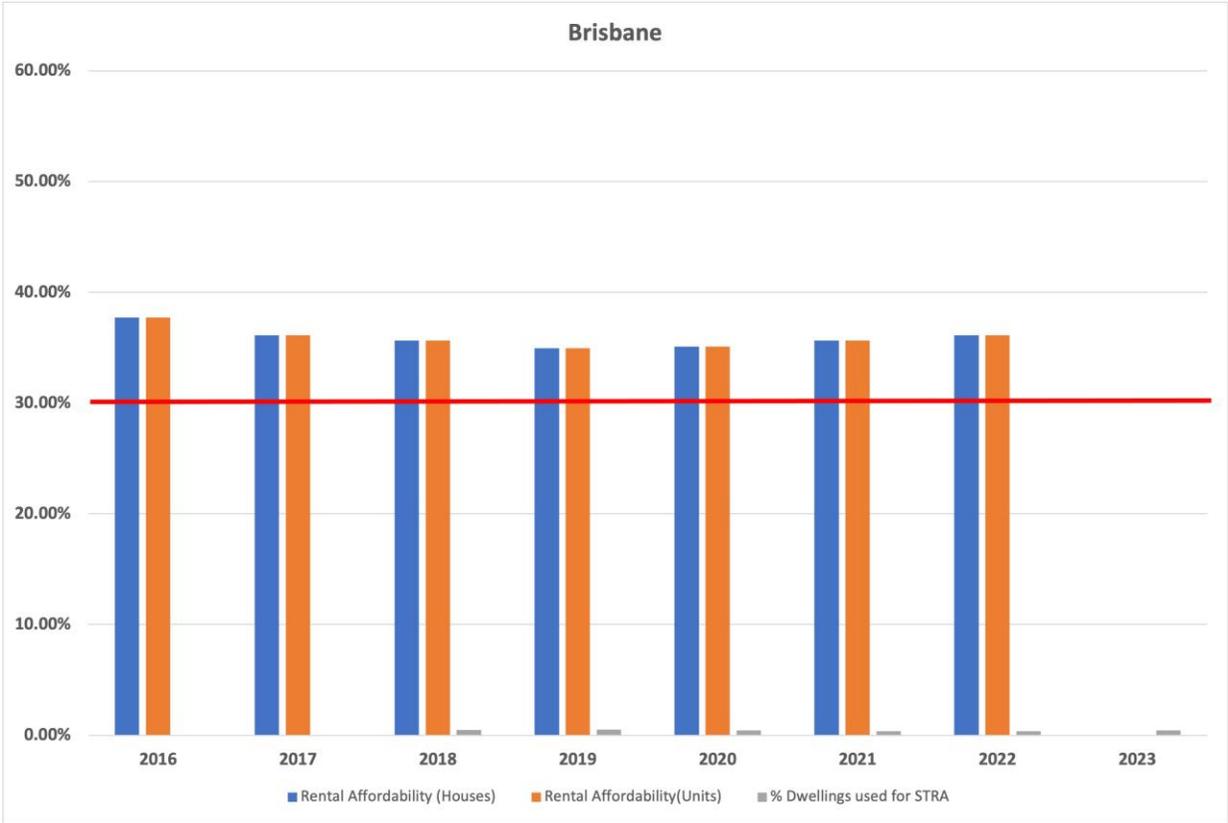| Predictors	Houses (DiD)		Units (DiD)	
	Estimates	Estimates	Estimates	Estimates
Y=2022,2023Q1	0.29***	0.38***	0.23**	0.28***
T=Noosa	0.23	0.29	0.06	0.3*

Y=2022-23 × T=Noosa (Regulation Effect)	0.13	0.05	0.22	0.1
Sample - LGAs	24 (2018-2019, 2022-2023Q1) ^(a)	24 (2018-2019, 2022-2023Q1) ^(a)	24 (2018-2019, 2022-2023Q1) ^(a)	24 (2018-2019, 2022-2023Q1) ^(a)
R^2 / R^2 adjusted	0.544 / 0.475	0.513 / 0.440	0.390 / 0.298	0.486 / 0.409
Source:	APM Median price listings - rents; Deckard Listings	Corelogic Median Rent AVM; Deckard Listings	APM Median price listings - rents; Deckard Listings	Corelogic Median Rent AVM; Deckard Listings
Noosa Plan 2006 Period	2018-2019 pre-treatment		2018-2019 pre-treatment	
Post Regulation Period (Y)	2022-2023(Q1)		2022-2023(Q1)	
Treated (T)	Noosa		Noosa	
Untreated (Control)	Brisbane, Gold Coast Sushine Coast, Douglas, Whitsunday		Brisbane, Gold Coast Sushine Coast, Douglas, Whitsunday	
^(a)	To avoid confounding with COVID, pre-treatment period is up to 2019		To avoid confounding with COVID, pre-treatment period is up to 2019	

*** Significant at the 1% level ; ** Significant at the 5% level ; * Significant at the 10% level

Appendix 3: Rental Affordability and Rental Increases and Dwellings on STRA – High-Definition Graphs and Maps

Brisbane
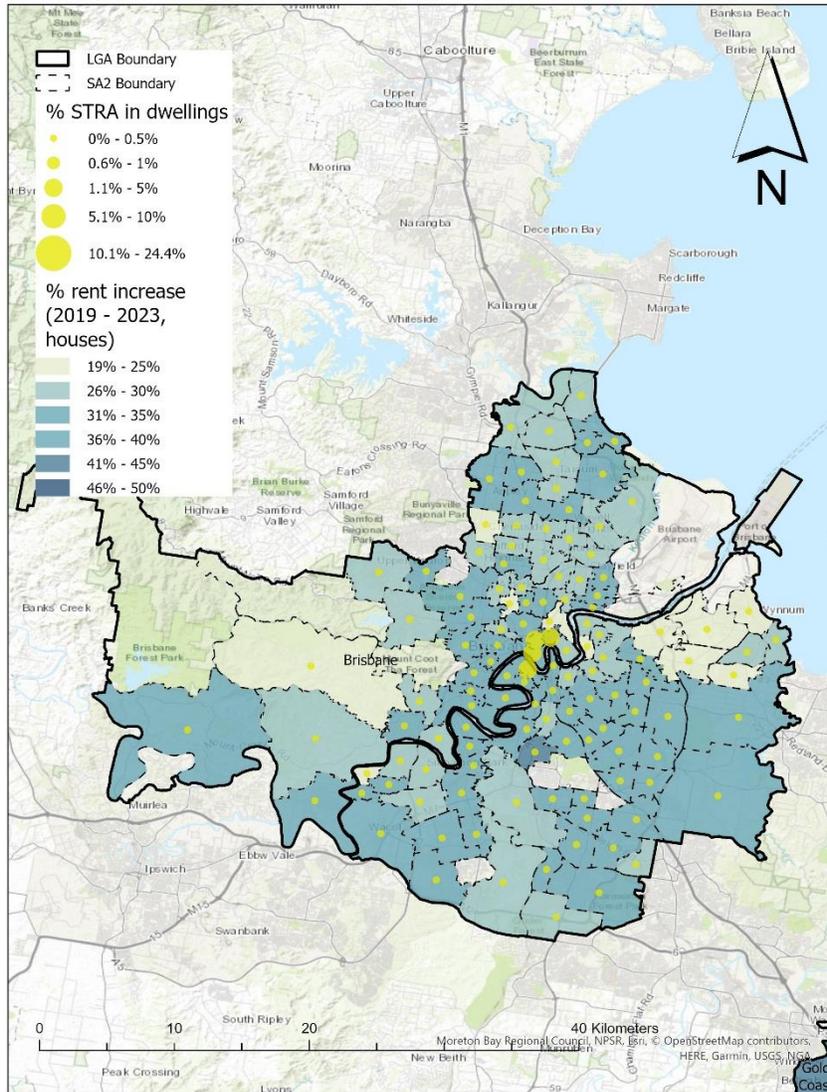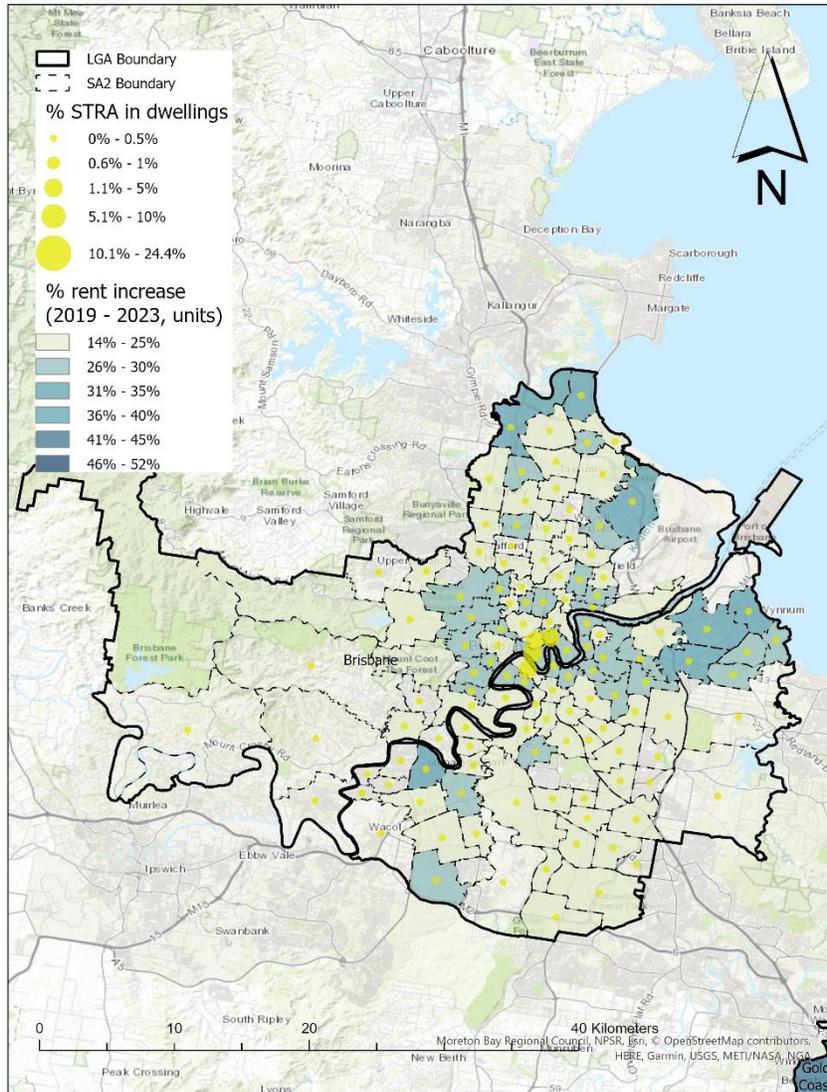
Gold Coast

Gold Coast

Noosa and Sunshine Coast

Sunshine Coast

Legend: ■ Rental Affordability (Houses) ■ Rental Affordability(Units) ■ % Dwellings used for STRA

Noosa

Legend: Rental Affordability (Houses) | Rental Affordability(Units) | % Dwellings used for STRA

Douglas

Whitsunday

Whitsunday

Legend:
- LGA Boundary
- SA2 Boundary

% STRA in dwellings
- 0% - 0.5%
- 0.6% - 1%
- 1.1% - 5%
- 5.1% - 10%
- 10.1% - 24.4%

% rent increase
(2019 - 2023, units)
- 14% - 25%
- 26% - 30%
- 31% - 35%
- 36% - 40%
- 41% - 45%
- 46% - 52%
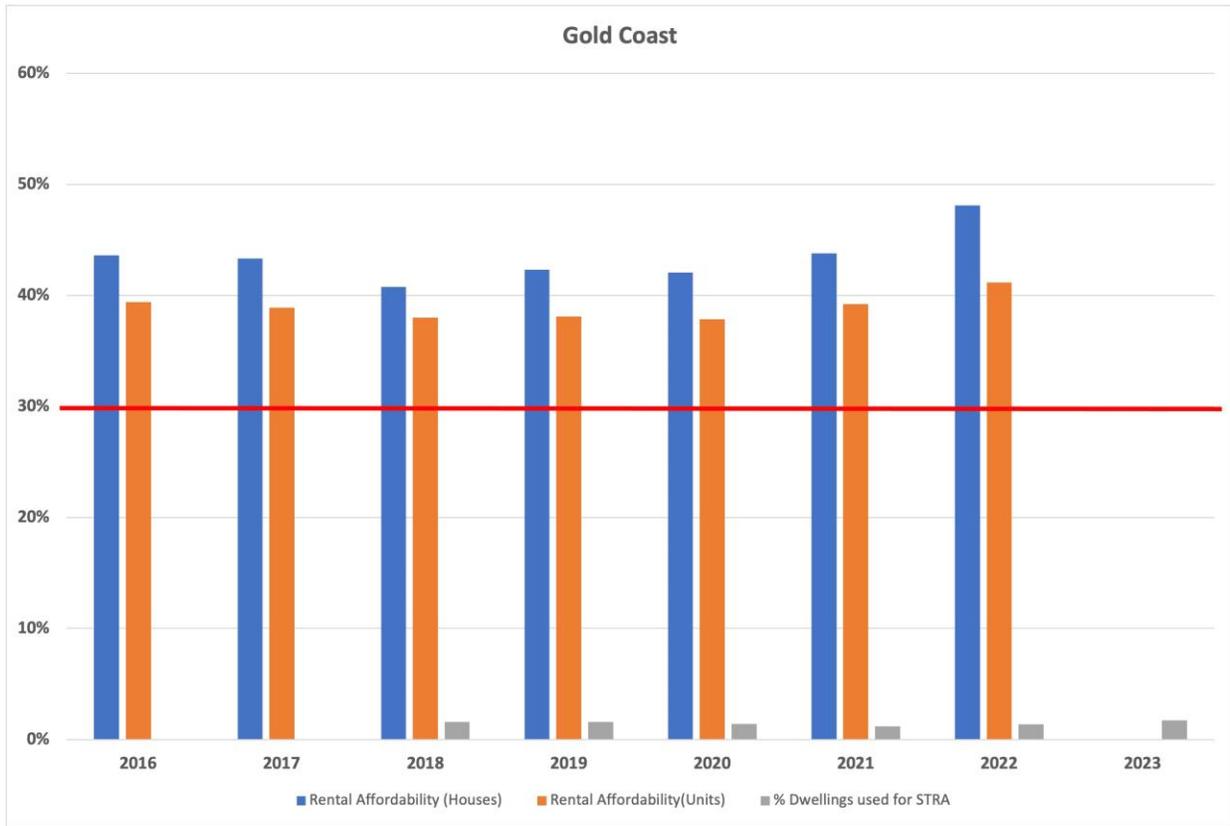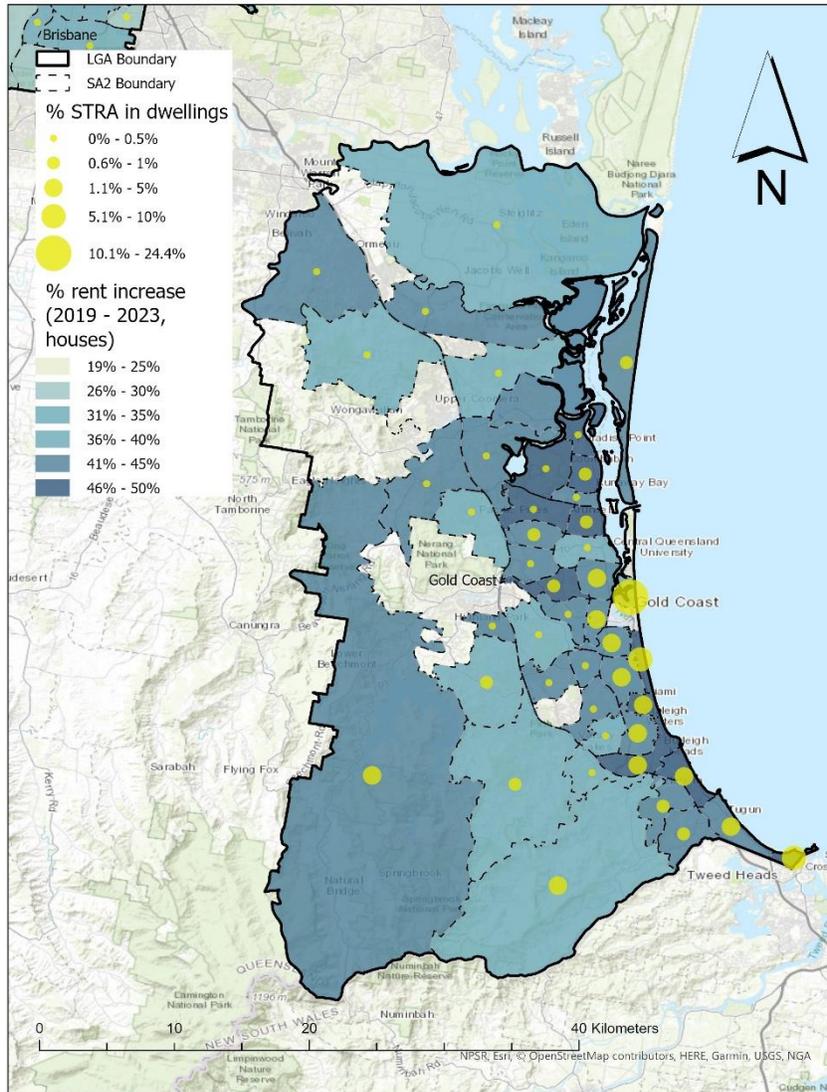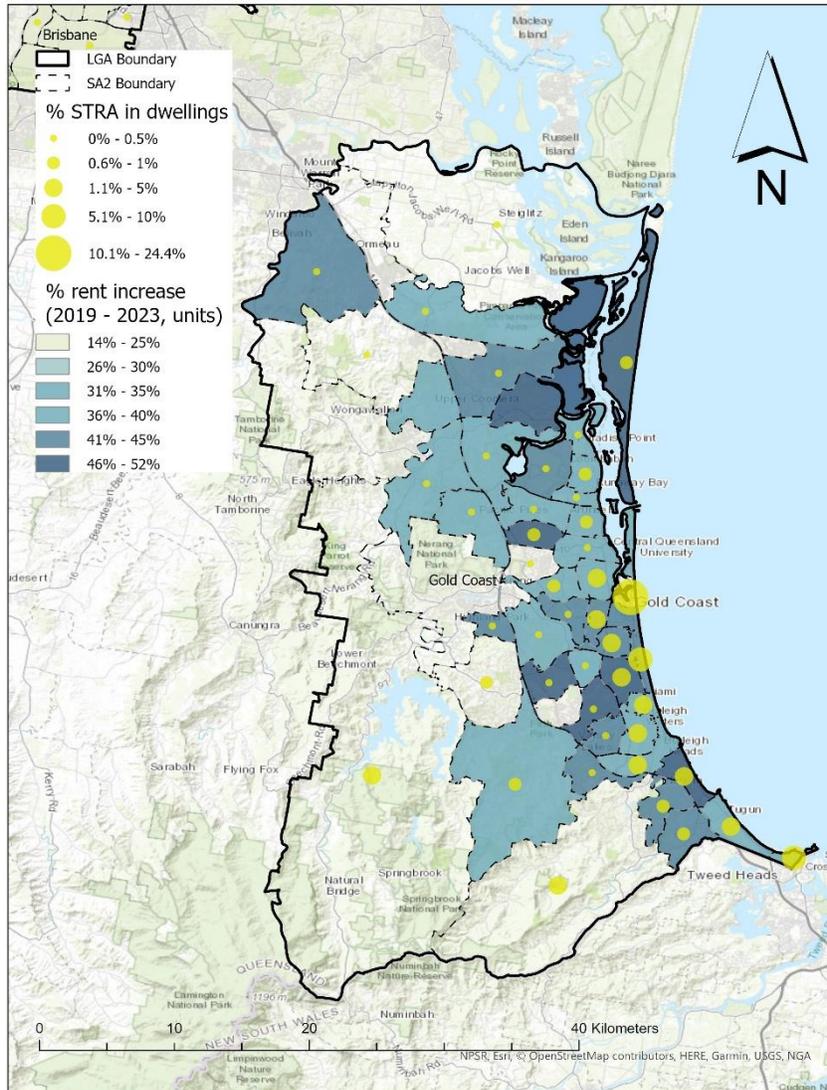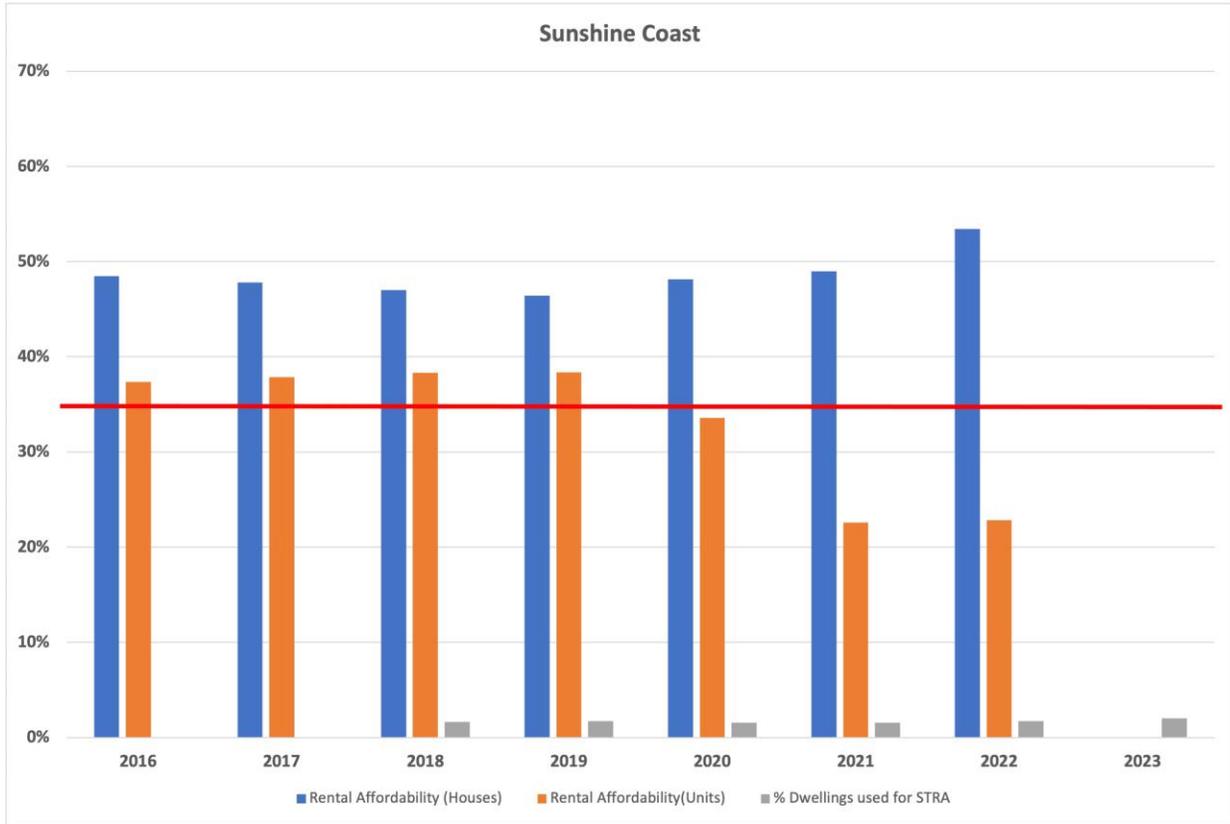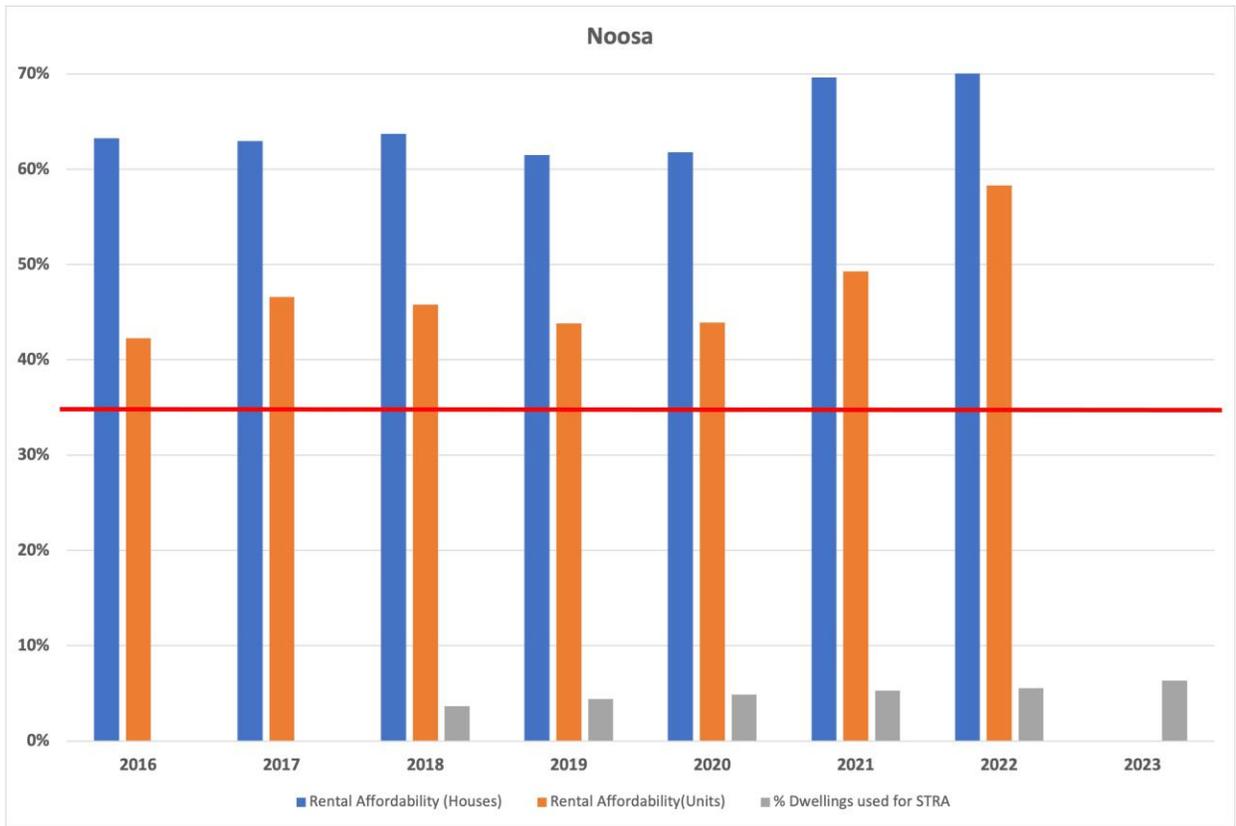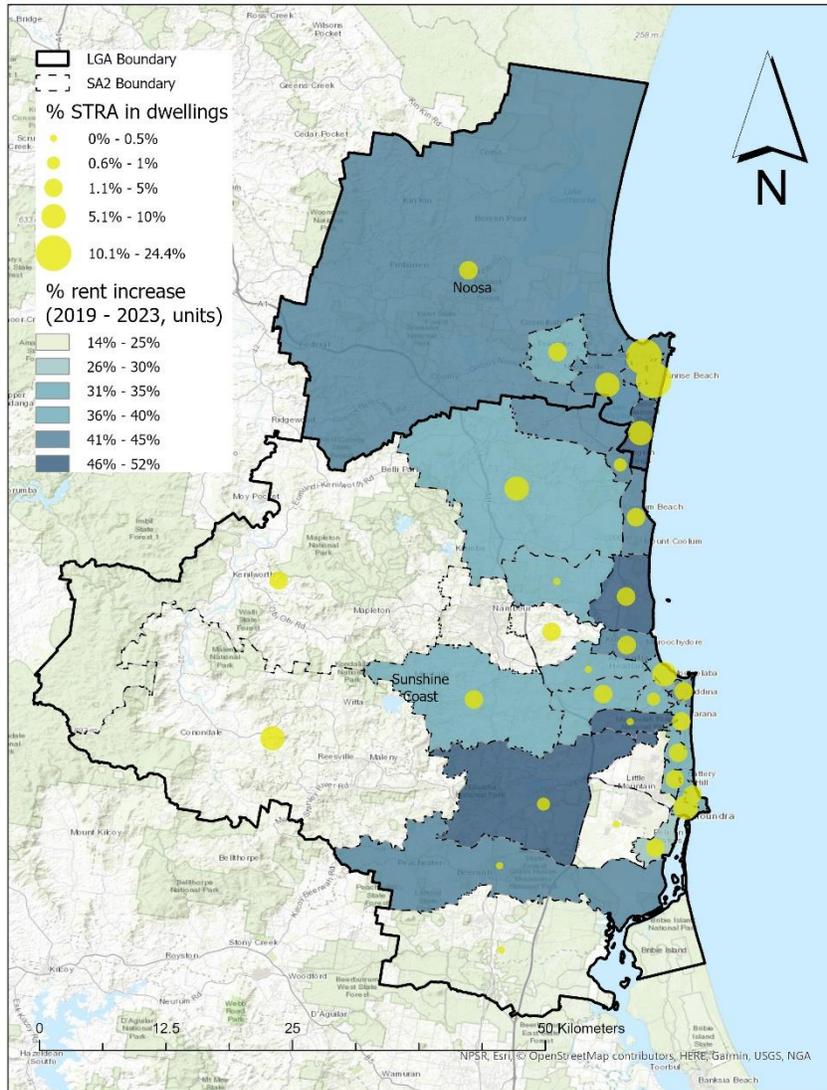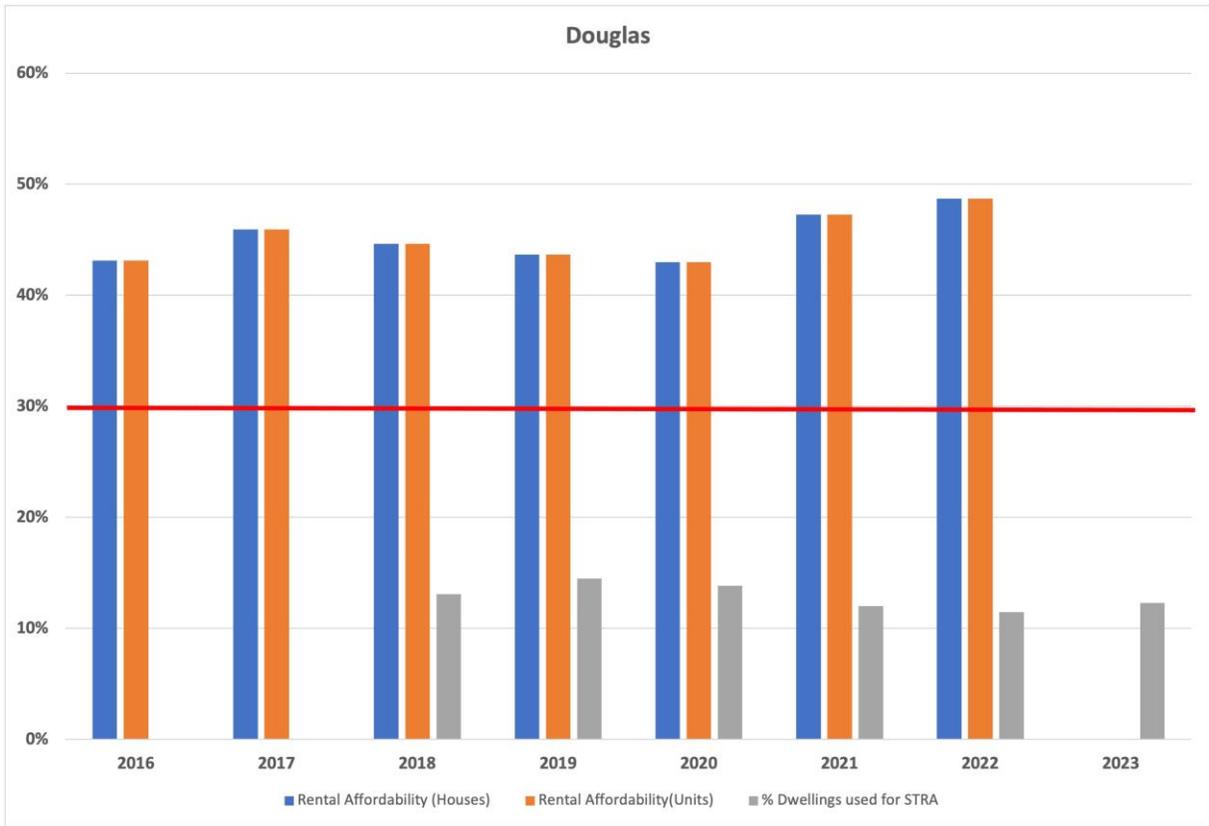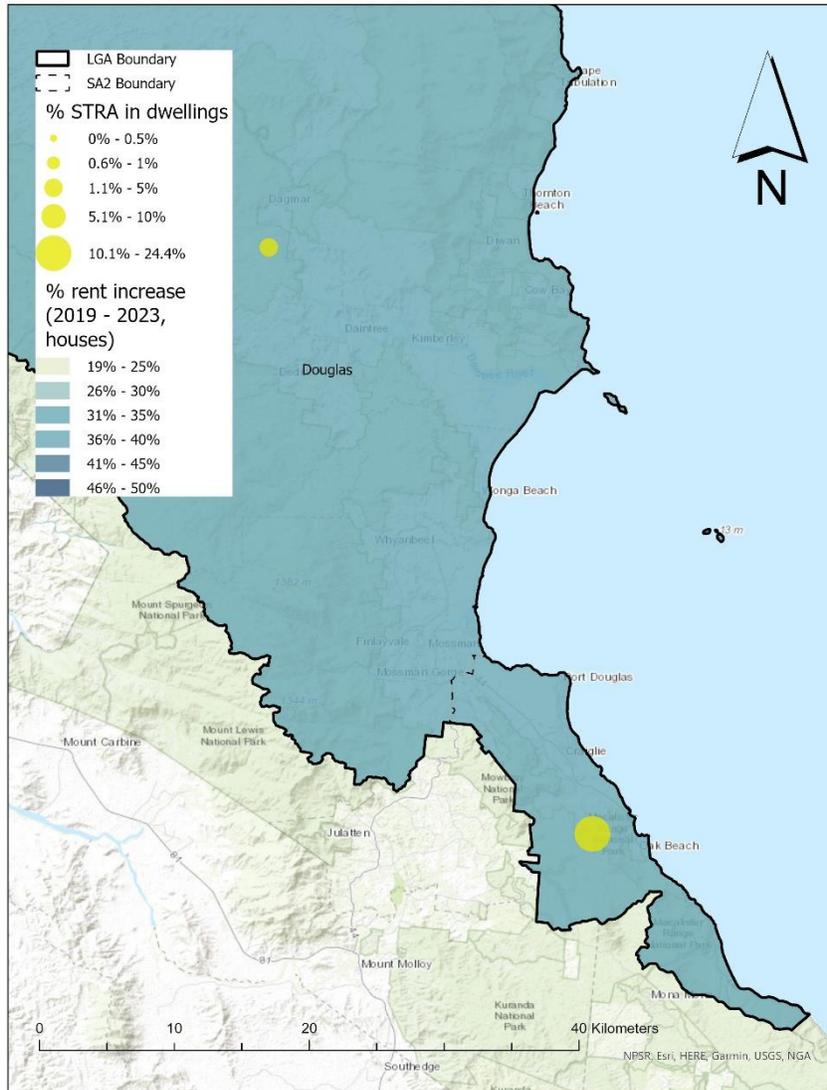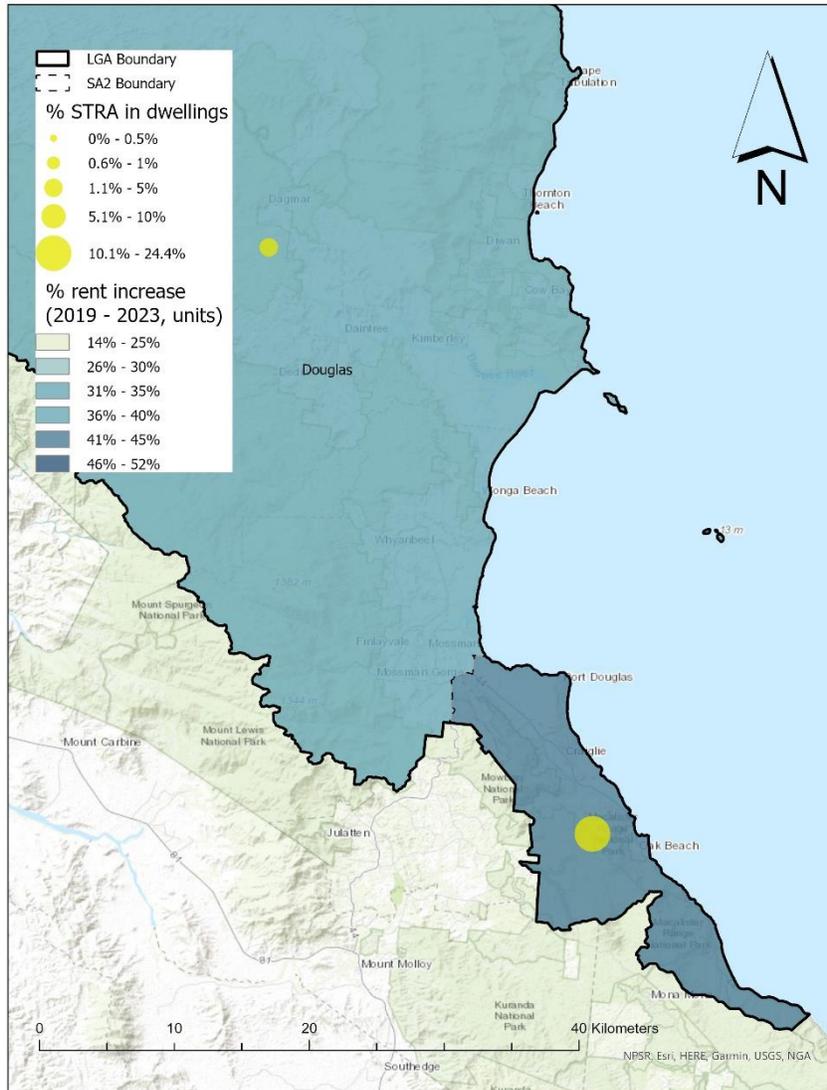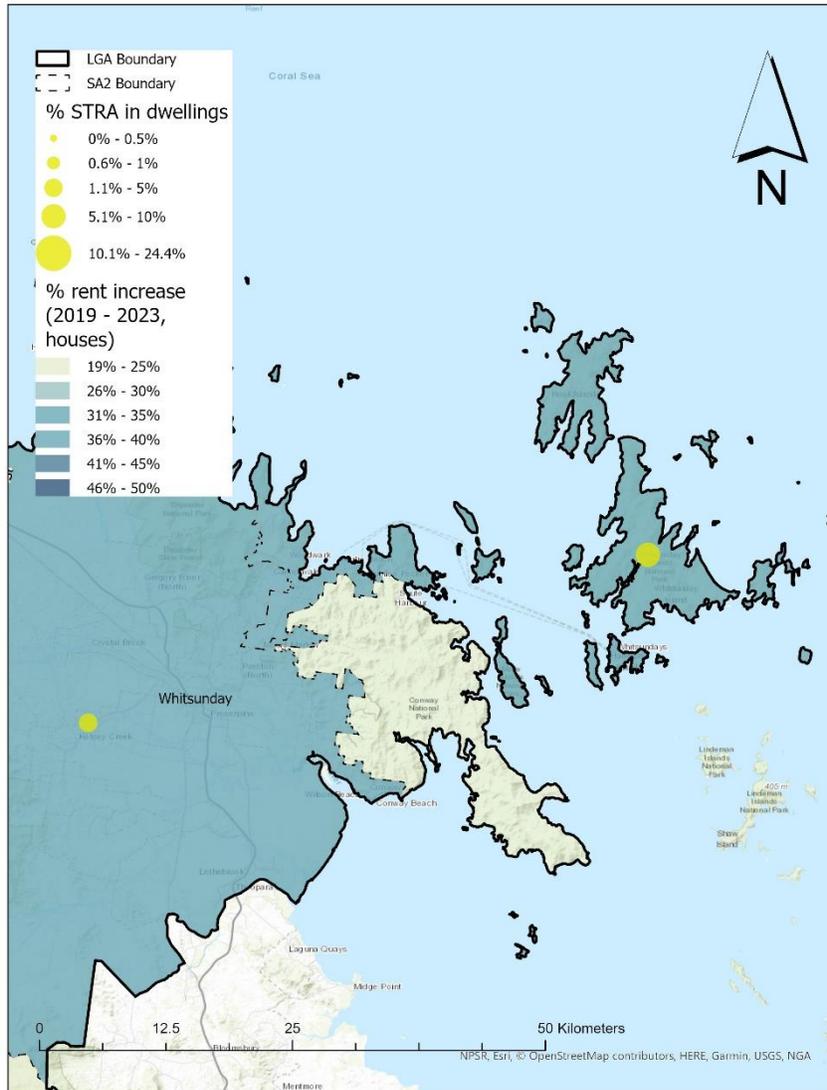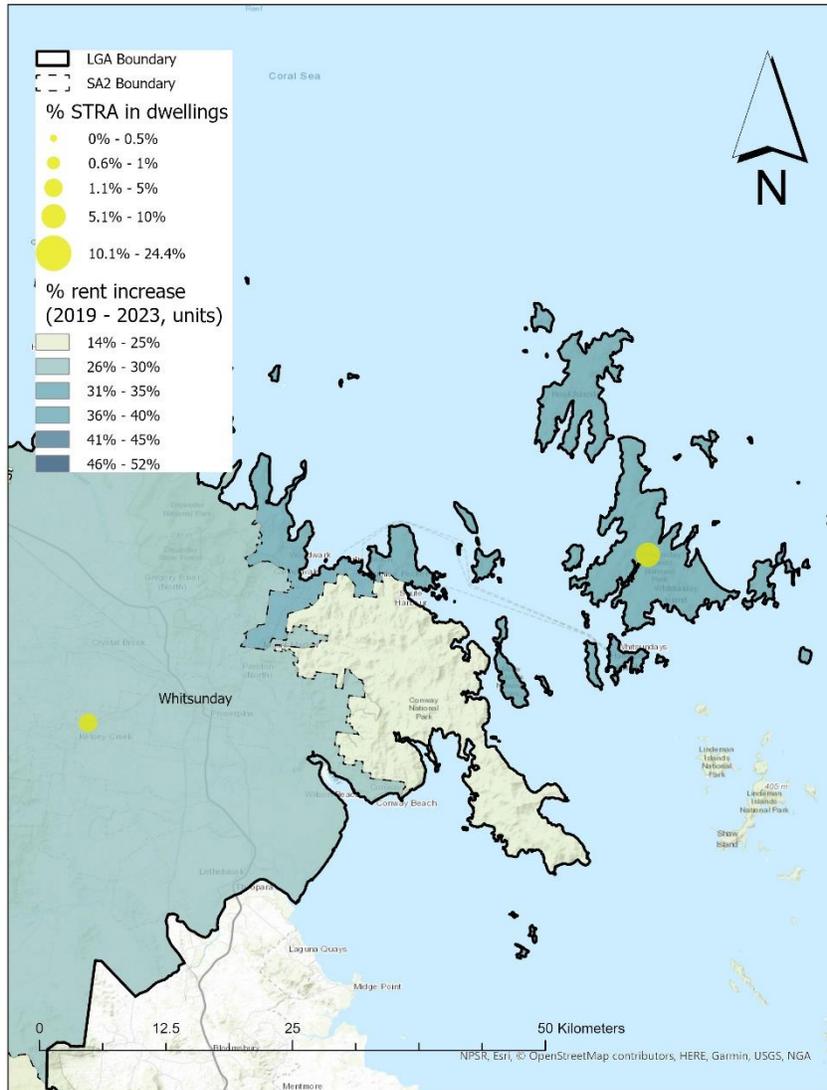
Appendix 4: Comparison of Regulatory Environment for Selected Councils

Introduction

Short-term accommodation is the rental of an entire dwelling house or unit by the property owner is unlikely to be a subsidiary to the residential use of the property

It does not include home-based businesses, where temporary accommodation must be subsidiary to the principal residential use. For example, a bed and breakfast

Reading the Tables

The tables are specific to short-term accommodation as stated in the Introduction (and does not consider home-based businesses). They identify the following:

- The category of development
- Accepted and accepted with/subject to requirements
- Assessable development – code or impact
- Category of assessment – code or impact, in
- A zone and where used, precinct of a zone; and
- Any overlays used
- Assessment benchmarks (in assessable benchmarks column) for assessable development and requirements/parameters for accepted development, including
- A zone code or specific provisions of a zone code
- A local plan code or specific provisions of a land code (if applicable)
- An overlay code or specific provisions of an overlay code (if applicable)
- Any other applicable codes specified in the 'assessment benchmark' column

Note1: Where any codes specified in (3), reference is made to that regions' city plan or planning scheme, whichever is applicable.

Any variations or parameters required for the category of assessment (indicated under 'assessment' column with "If" and then the parameters)

Category of assessment

Code assessable/assessment development:

- Is to be assessed against all the assessment benchmarks identified in the 'assessment benchmark' column (with reference to that regions' specific city plan or planning scheme);
- That complies with the purpose and overall outcomes of the code;
- Impact assessable development:
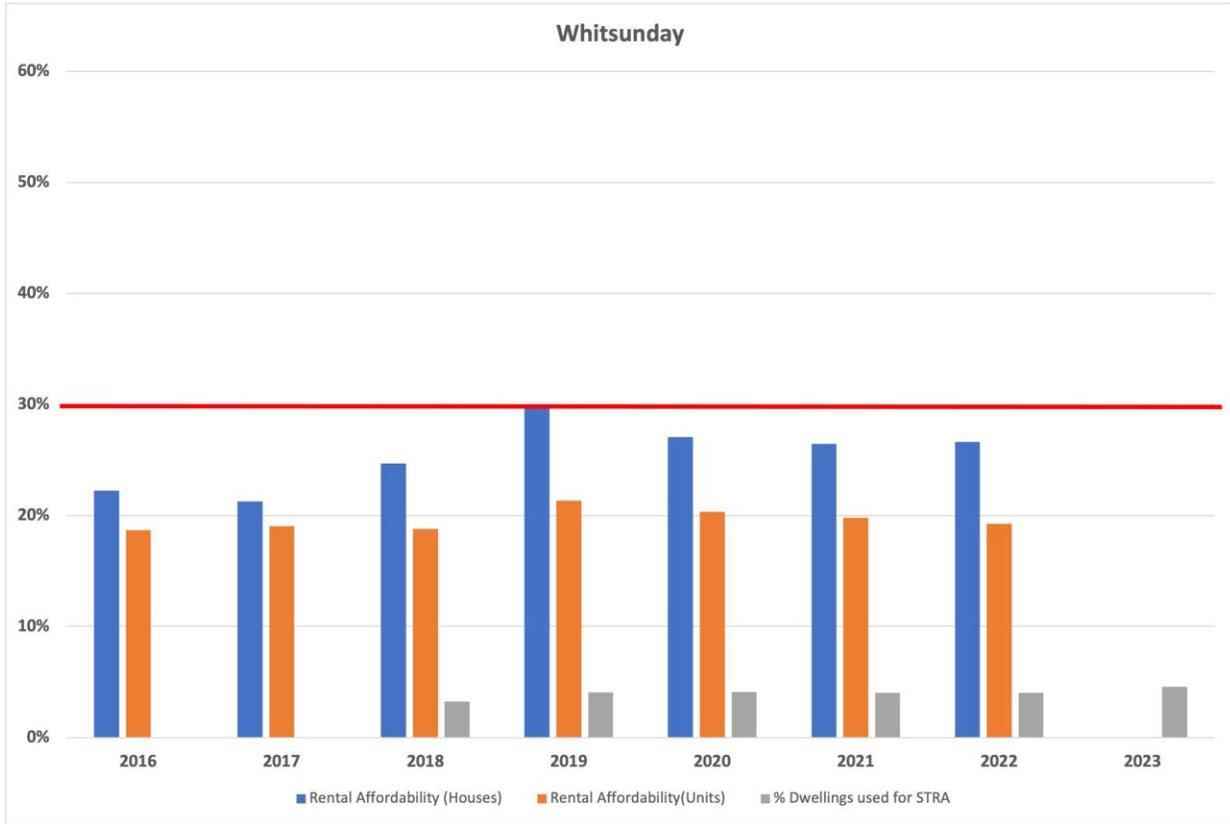- Is to be assessed against the identified assessment benchmarks in the 'assessment benchmark' column (where relevant)
- Is to be assessed against the entire planning scheme, to the extent relevant;

Note2: Any codes specified in code or impact assessments, reference is made to that regions' city plan or planning scheme, whichever is applicable

Tables

Brisbane

Assessment	Assessment Benchmark
Note: - Brisbane City Council outlines a "transitory accommodation" category, defined in the Brisbane City Council Annual Plan and Budget 2022-2023. Ratepayers who fall in this category are subject to the rates outlined in the Resolution of Rates and Charges of the Brisbane City Council Annual Plan and Budget 2022-2023. Note: - This table for references Part 5 Tables of Assessment - Brisbane City Council City Plan 2014, for the various zones. Note: - Refer to Table 5.3.5.1 – Prescribed secondary code, Brisbane City Council City Plan 2014, for secondary codes for short-term accommodation. For example, these are, but not limited to, landscape work code, infrastructure design code, stormwater code,…etc. Please refer to Table 5.3.5.1 for a full list. Note: - Part 9 – 9.3.22 Short-term accommodation code outlines performance outcomes and acceptable outcomes. The associated tables contained in 9.3.22 outlines various criteria for air quality, noise impact assessment, odour criteria and other amenities. Please refer to 9.3.22 for full details. Note: - For other zones not specified below, an impact assessment is needed with the assessment benchmark being the entire planning scheme including relevant codes outlined for the specified zone	
Low-medium density – Assessable Development – Code Assessment – Table 5.5.2 Brisbane City Council City Plan 2014	

If in the Up to 3 storeys zone precinct or the 2 or 3 storey mix zone precinct and fronting an arterial or suburban road, where no greater than:
  a. 3 storeys and 11.5m in building height in the Up to 3 storeys zone precinct; or
  b. 3 storeys and 11.5m in building height in the 2 or 3 storey mix zone precinct and any part of the site is within 400m walking distance of a dedicated public pedestrian access point of a railway or busway station; or
  c. 2 storeys and 9.5m in building height
	Multiple dwelling code
	Short-term accommodation code
	Low-medium density residential zone code
	Prescribed secondary code

Medium density residential – Assessable Development – Code Assessment – Table 5.5.3 Brisbane City Council City Plan 2014	

If no greater than:
  a. the building height specified in a relevant neighbourhood plan;
  b. where a neighbourhood plan does not specify building height, 5 storeys
	Multiple dwelling code
	Short-term accommodation code

	Medium density residential zone code Prescribed secondary code

High density residential – Assessable Development – Code Assessment – Table 5.5.4 Brisbane City Council City Plan 2014

If no greater than:
   a. the building height specified in a relevant neighbourhood plan;
   b. where a neighbourhood plan does not specify building height:
     i)   8 storeys in the Up to 8 storeys zone precinct; or
     ii)   15 storeys in the Up to 15 storeys zone precinct
	Multiple dwelling code
	Short-term accommodation code
	High density residential zone code
	Prescribed secondary code

Principal Centre – Table 5.5.7 Brisbane City Council City Plan 2014

Note: In the form of Home-based business
 	
Accepted development, subject to compliance with identified requirements:
   -   If complying with all acceptable outcomes in the Home-based business code
Assessable development—Code assessment
   -   If not complying with all acceptable outcomes in the Home-based business code
	Home-based business code

Major Centre – Table 5.5.8 Brisbane City Council City Plan 2014

Note: In the form of Home-based business Accepted development, subject to compliance with identified requirements: - If complying with all acceptable outcomes in the Home-based business code Assessable development—Code assessment If not complying with all acceptable outcomes in the Home-based business code	Home-based business code

District Centre – Table 5.5.9 Brisbane City Council City Plan 2014

Note: In the form of Home-based business Accepted development, subject to compliance with identified requirements:	Home-based business code

- If complying with all acceptable outcomes in the Home-based business code Assessable development—Code assessment If not complying with all acceptable outcomes in the Home-based business code	
Tourist Accommodation – Assessable Development – Code Assessment – Table 5.5.6 Brisbane City Council City Plan 2014	
If within an existing premises	Tourist accommodation zone code
Neighbourhood Plans	
Depends on location. Please refer to Part 5 – 5.9 Categories of Development and assessment – Neighbourhood Plans, Brisbane City Council City Plan 2014	

Assessment	Assessment Benchmark
Note: For other zones not specified below, an impact assessment is needed with the assessment benchmark being the entire planning scheme	
Medium Density – Table 5.5.2 City of Gold Coast City Plan 2022	
Code assessment - If including direct access to Gold Coast Highway	Any overlay code triggered by an overlay map: Medium density residential zone code Bed and breakfast and farm stay code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code High-rise accommodation design code Multiple accommodation code On-site sewerage facilities code Solid waste management code Transport code Vegetation management code
Impact Assessment – Not elsewhere included	City Plan including: Strategic framework Any overlay code triggered by an overlay map: Medium density residential zone code Bed and breakfast and farm stay code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code High-rise accommodation design code Multiple accommodation code On-site sewerage facilities code Social and health impact assessment code Solid waste management code Surf life saving club code Tourist park code Transport code Vegetation management code
High Density – Table 5.5.3 City of Gold Coast City Plan 2022	

Code Assessment	Any overlay code triggered by an overlay map:
	High density residential zone code
	Bed and breakfast and farm stay code
	Commercial design code
	Driveways and vehicular crossings code
	Fire services in developments accessed by common private title code
	General development provisions code
	Healthy waters code
	High-rise accommodation design code
	Multiple accommodation code
	On-site sewerage facilities code
	Solid waste management code
	Surf life saving club code
	Transport code
	Vegetation management code
Centre Zone – Table 5.5.4 City of Gold Coast City Plan 2022	
Code Assessment	Any overlay code triggered by an overlay map:
	Centre zone code
	Bed and breakfast and farm stay code
	Commercial design code
	Driveways and vehicular crossings code
	Fire services in developments accessed by common private title code
	General development provisions code
	Healthy waters code
	High-rise accommodation design code
	Multiple accommodation code
	On-site sewerage facilities code
	Solid waste management code
	Surf life saving club code
	Transport code
	Vegetation management code
Neighbourhood Centre – Table 5.5.5 City of Gold Coast City Plan 2022	
Code assessment – if including direct access to Musgrave Street or Marine Parade, Coolangatta	Any overlay code triggered by an overlay map:
	Neighbourhood centre zone code
	Bed and breakfast and farm stay code
	Commercial design code
	Driveways and vehicular crossings code
	Fire services in developments accessed by common private title code
	General development provisions code

	Healthy waters code High-rise accommodation design code Multiple accommodation code On-site sewerage facilities code Solid waste management code Surf life saving club code Transport code Vegetation management code
Impact Assessment – not elsewhere included	City Plan including: Strategic framework Any overlay code triggered by an overlay map: Neighbourhood centre zone code Bed and breakfast and farm stay code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code High-rise accommodation design code Multiple accommodation code On-site sewerage facilities code Social and health impact assessment code Solid waste management code Surf life saving club code Transport code Vegetation management code
Sport and Recreation (where not in a precinct) – Table 5.5.6 City of Gold Coast City Plan 2022	
Impact assessment	City Plan including: Strategic framework Any overlay code triggered by an overlay map: Sport and recreation zone code Bed and breakfast and farm stay code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code High rise accommodation design code

	Multiple accommodation code On-site sewerage facilities code Social and health impact assessment code Solid waste management code Surf life saving club code Transport code Vegetation management code
Sport and Recreation (Bundall equestrian area precinct) – Table 5.5.6(2) City of Gold Coast City Plan 2022	
Code assessment	Any overlay code triggered by an overlay map: Sport and recreation zone code Bed and breakfast and farm stay code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code High-rise accommodation design code Multiple accommodation code On-site sewerage facilities code Solid waste management code Surf life saving club code Transport code Vegetation management code
Major tourism zone (The Spit northern tourism precinct) - Table 5.5.13(1) City of Gold Coast City Plan 2022	
Code assessment	Any overlay code triggered by an overlay map: Major tourism zone code Bed and breakfast and farm stay code General development provisions code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code Multiple accommodation code On-site sewerage facilities code Solid waste management code Transport code Vegetation management code

Major tourism zone (The Spit eastern tourism precinct) - Table 5.5.13(2) City of Gold Coast City Plan 2022	
Code assessment	Any overlay code triggered by an overlay map: Major tourism zone code Bed and breakfast and farm stay code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code Multiple accommodation code On-site sewerage facilities code Solid waste management code Transport code
Major tourism zone (The Spit southern tourism precinct) - Table 5.5.13 (3) City of Gold Coast City Plan 2022	
Code assessment	Any overlay code triggered by an overlay map: Major tourism zone code Bed and breakfast and farm stay code Commercial design code Driveways and vehicular crossings code Fire services in developments accessed by common private title code General development provisions code Healthy waters code Multiple accommodation code On-site sewerage facilities code Solid waste management code Surf life saving club code Transport code Vegetation management code
Innovation zone (including the Bond university precinct) - Table 5.5.17 City of Gold Coast City Plan 2022	
Accepted subject to requirements - if in the Bond University precinct and ancillary to the functioning of the Bond University	If in the Bond University precinct: Any overlay code triggered by an overlay map: Innovation zone code Bed and breakfast and farm stay code Fire services in developments accessed by common private title code General development provisions code Healthy waters code

	Transport code
	If not in the Bond University precinct:
	Any overlay code triggered by an overlay map
	Innovation zone code
	Bed and breakfast and farm stay code
	Commercial design code
	Fire services in developments accessed by common private title code
	General development provisions code
	Healthy waters code
	Transport code
Code assessment –	Any overlay code triggered by an overlay map:
	Innovation zone code
	Bed and breakfast and farm stay code
	Commercial design code
	Driveways and vehicular crossings code
	Fire services in developments accessed by common private title code
	General development provisions code Healthy waters code
	High-rise accommodation code
	Multiple accommodation code
	On-site sewerage facilities code
	Solid waste management code
	Surf life saving club code
	Transport code
	Vegetation management code
Limited development (constrained land) zone – Table 5.5.18 City of Gold Coast City Plan 2022	
Impact assessment	City Plan including:
	Strategic framework
	Any overlay code triggered by an overlay map:
	Limited development (constrained land) zone code
	Bed and breakfast and farm stay code
	Commercial design code
	Driveways and vehicular crossings code
	Fire services in developments accessed by common private title code
	General development provisions code
	Healthy waters code
	High-rise accommodation design code

	Multiple accommodation code
	On-site sewerage facilities code
	Social and health impact assessment code
	Solid waste management code
	Surf life saving club code
	Tourist park code
	Transport code
	Vegetation management code
Mixed use zone (including the Bermuda point precinct) – Table 5.5.19 City of Gold Coast City Plan 2022	
Code assessment	Any overlay code triggered by an overlay map:
	Mixed use zone code
	Bed and breakfast and farm stay code
	Commercial design code
	Driveways and vehicular crossings code
	Fire services in developments accessed by common private title code
	General development provisions code
	Healthy waters code
	High-rise accommodation design code
	Multiple accommodation code
	On-site sewerage facilities code
	Solid waste management code
	Surf life saving club code
	Transport code
	Vegetation management code
Rural zone (where not in a precinct) – Table 5.5.20 City of Gold Coast City Plan 2022	
Accepted subject to requirements – if farm stay	Any overlay code triggered by an overlay map:
	Rural zone code
	Bed and breakfast and farm stay code
	General development provisions code
	Healthy waters code
	Transport code

Douglas

Assessment	Assessment Benchmark
Note: - Where indicated with [x] - means 'Other development codes' are only applicable to the extent they are relevant to the specific type of application proposed (i.e. if no vegetation damage is proposed, then the Vegetation management code does not apply)	

Note: - Where indicated with [^] – means applicable local plan codes are identified by reference to the local plan maps contained in schedule 2 of Douglas Shire Planning Scheme 2018 Note: - Where indicated with [*] – means applicable overlay codes are identified by reference to the overlay maps in schedule 2 of Douglas Shire Planning Scheme 2018 Note: - Home-based businesses for Centre zone, Conservation zone, low density, low-medium, medium, rural and rural residential are not covered in this table. For these, please refer to Part 5 of Douglas Shire Planning Scheme 2018 Note: - Refer to Part 6 of Douglas Shire Planning Scheme 2018 Note: - For other zones not specified below, an impact assessment is needed with the assessment benchmark being the entire planning scheme	

Centre Zone – Table 5.6.a Douglas Shire Planning Scheme 2018

Impact assessable	Whole of the Douglas Shire planning scheme Access, parking and servicing code [x] Infrastructure works code [x] Landscaping code [x] Vegetation management code [x]
Code assessable - If within Sub-precinct 1a of Precinct 1 Town Centre Precinct of the Douglas / Craiglie local plan	Centre zone code Coastal communities local plan code [^] Mossman local plan code [^] Douglas / Craiglie local plan code [^] Acid sulphate soils overlay code [*] Bushfire hazard overlay code [*] Coastal environment overlay code [*] Flood and storm tide hazard overlay code [*] Natural areas overlay code [*] Places of significance overlay code [*] Transport network overlay code [*] Multiple dwelling, short term accommodation and retirement facility code

Tourist Accommodation – Table 5.6.n - Douglas Shire Planning Scheme 2018

Code assessable – Refer to 6.2.14.3 Criteria for assessment - Douglas Shire Planning Scheme 2018. Other codes in the 'assessment benchmark' column are dependant on property location.	Tourist accommodation zone code Mossman local plan code [^] Douglas / Craiglie local plan code [^] Acid sulphate soils overlay code [*] Bushfire hazard overlay code [*] Coastal environment overlay code [*] Flood and storm tide hazard overlay code [*] Natural areas overlay code [*] Places of significance overlay code [*]

	Potential landslide hazard overlay code [*]
	Transport network overlay code [*]
	Multiple dwelling , short term accommodation and retirement facility code
	Access, parking and servicing code [X]
	Environmental performance code [X]
	Infrastructure works code [X]
	Landscaping code [X]

Assessment	Assessment Benchmark
Note: - For other zones not specified below, an impact assessment is needed with the assessment benchmark being the entire planning scheme	
District Centre – Table 5.5.2 Whitsunday Regional Council Planning Scheme 2017	
Code assessment	Multi-unit uses code District centre zone code Transport and parking code Landscaping code Infrastructure code
Local Centre – Table 5.5.7 Whitsunday Regional Council Planning Scheme 2017	
Code assessment	Multi-unit uses code Local centre zone code Infrastructure code Landscaping code Transport and parking code
Low-medium density – Table 5.5.10 Whitsunday Regional Council Planning Scheme 2017	
Code assessment	Multi-unit uses code Low-medium density residential zone code Infrastructure code Landscaping code Transport and parking code
Major centre – Table 5.5.11 Whitsunday Regional Council Planning Scheme 2017	
Code assessment	Multi-unit uses code Major centre zone code Infrastructure code Landscaping code Transport and parking code
Mixed use – Table 5.5.13 Whitsunday Regional Council Planning Scheme 2017	
Code assessment	Multi-unit uses code Mixed use zone code Infrastructure code Landscaping code Transport and parking code
Tourist Accommodation – Table 5.5.19 Whitsunday Regional Council Planning Scheme 2017	

Code assessment	Multi-unit uses code
	Tourist accommodation zone code
	Infrastructure code
	Landscaping code
	Transport and parking code

Sunshine Coast

Assessment	Assessment Benchmark
Note: - Sunshine Coast Council (SCC) outlines a "transitory accommodation" category, defined in the Sunshine Coast Council Revenue Statement. Ratepayers who fall in this category are subject to the rates outlined in the Rating Category Statement of the Sunshine Coast Council. Note: - For other zones not specified below, an impact assessment is needed with the assessment benchmark being the entire planning scheme	
Medium density – Table 5.5.2 Sunshine Coast Planning Scheme 2014	
Code assessment	Medium density residential zone code
	Applicable local plan code
	Multi-unit residential uses code
	Prescribed other development codes
High density – Table 5.5.3 Sunshine Coast Planning Scheme 2014	
Code assessment	High density residential zone code
	Applicable local plan code
	Multi-unit residential uses code
	Prescribed other development codes
Tourist accommodation - Table 5.5.4 Sunshine Coast Planning Scheme 2014	
Code assessment	Tourist accommodation zone code
	Applicable local plan code
	Multi-unit residential uses code
	Prescribed other development codes
Principal centre - Table 5.5.5 Sunshine Coast Planning Scheme 2014	
Code assessment	Principal centre zone code
	Maroochydore/Kuluin local plan code
	Multi-unit residential uses code
	Prescribed other development codes
Major centre - Table 5.5.6 Sunshine Coast Planning Scheme 2014	
Code assessment	Major centre zone code
	Applicable local plan code

	Multi-unit residential uses code Prescribed other development codes
District centre - Table 5.5.7 Sunshine Coast Planning Scheme 2014	
Code assessment	District centre zone code Applicable local plan code Multi-unit residential uses code Prescribed other development codes
Local centre - Table 5.5.8 Sunshine Coast Planning Scheme 2014	
Code assessment	Local centre zone code Applicable local plan code Multi-unit residential uses code Prescribed other development codes
Sports and recreation - Table 5.5.13 Sunshine Coast Planning Scheme 2014	

Code assessment if –
(a) located on:-
    (i) Council owned or controlled land; or
    (ii) Lot 3 on RP41427 located at 325-367 David Low Way, Bli Bli; and (b) conducted in association with a sport and recreation use on the same site.
	Sport and recreation zone code
	Applicable local plan code
	Multi-unit residential uses code
	Prescribed other development codes

Community facilities - Table 5.5.16 Sunshine Coast Planning Scheme 2014	
Code assessment if – (a) located on Council owned or controlled land and conducted in association with a community use, educational establishment or sport and recreation activity; or (b) conducted in association with a hospital on the same site.	Community facilities zone code Applicable local plan code Multi unit residential uses code Prescribed other development codes
Impact assessment if not otherwise specified	The planning scheme
Rural - Table 5.5.19 Sunshine Coast Planning Scheme 2014	
Code assessment if – for a camping ground or not more than 8 holiday cabins	Rural zone code Applicable local plan code Nature and rural based tourism code Prescribed other development codes
Impact assessment if not otherwise specified	The planning scheme

Assessment	Assessment Benchmark
Note: - For other zones not specified below, an impact assessment is needed with the assessment benchmark being the entire planning scheme	
Medium density – Table 5.4.3 Redland City Plan 2018	
Code assessment – If building height does not exceed that detailed in Table 5.4.4 Building height	Medium density residential zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
Tourist accommodation – Table 5.4.6 Redland City Plan 2018	
Code assessment - If building height does not exceed 14m	Tourist accommodation zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
Principal centre - Table 5.4.7 Redland City Plan 2018	
Code assessment – if (1) not accepted subject to requirements; and (2) building height does not exceed the height shown on Figure 6.2.6.3.3 or Figure 6.2.6.3.4	Principal centre zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
Major centre - Table 5.4.8 Redland City Plan 2018	
Code assessment – If not accepted subject to requirements and building height does not exceed 17m	Major centre zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
District centre – Table 5.4.9 Redland City Plan 2018	
Code assessment – If building height does not exceed 17m	District centre zone code Healthy waters code

|	Infrastructure works code Landscape code Transport, servicing, access and parking code
Local centre – Table 5.4.10 Redland City Plan 2018	
Code assessment – If building height does not exceed 10.5m	Local centre zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
Neighbourhood centre – Table 5.4.10 Redland City Plan 2018	
Code assessment – If building height does not exceed: (1) 14m in the Kinross Road neighbourhood centre; and (2) 10.5m in other neighbourhood centres	Neighbourhood centre zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
Specialised centre – Table 5.4.12 Redland City Plan 2018	
Code assessment	Specialised centre zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
Conservation – Table 5.4.15 Redland City Plan 2018	
Code assessment – If: (1) undertaken by Redland City Council; or (2) undertaken on Council land and in accordance with a resolution of Redland City Council.	Conservation zone code Healthy waters code Infrastructure works code Landscape code Transport, servicing, access and parking code
Rural – Table 5.4.22 Redland City Plan 2018	
Code assessment – If not more than 10 rooms or units capable of separate occupation	Rural zone code Healthy waters code Infrastructure works code Landscape code

	Transport, servicing, access and parking code

Supplementary Material for Redland City Council:

The following consists of a table and two maps indicating building height requirements outlined for short-term accommodation by Redland City Council. These supplementary materials are referred to in the assessment table above for the region of Redland City Council.

Table 5.4.4 of Redland City Plan – Building Height for Medium Density Zone

Area		Maximum Building Height (m)
MDR1	Parkland living, Capalaba	22m
MDR2	Mount Cotton Road, Capalaba	19m
MDR3	Shore Street East, Cleveland	22m
MDR4	Cleveland	19m
MDR5	Esplanade, Redland Bay	19m
MDR7	Eprapah Creek, South East Thornlands	16m
MDR8	Kinross and Boundary Road	8.5m
Elsewhere in the zone (including MDR6 South East Thornlands and MDR9 Kinross Road)		13m
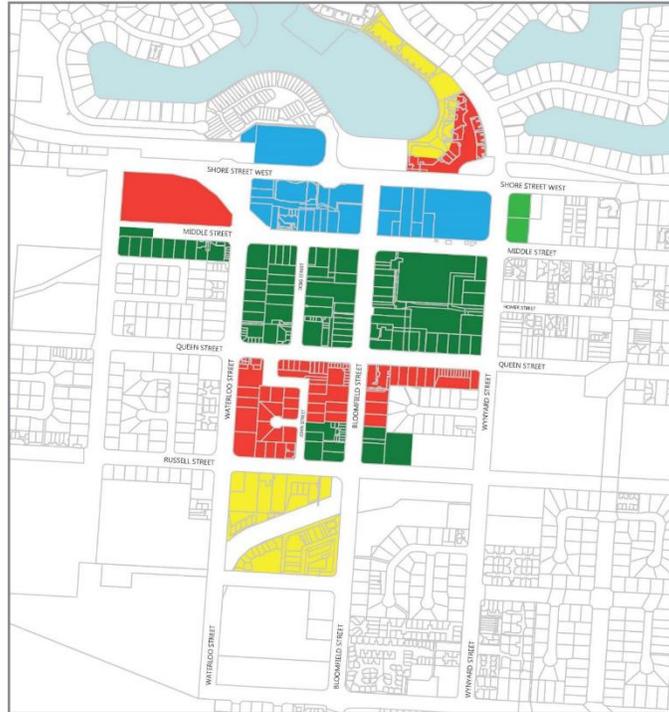
Cleveland - Building Heights

- 14 metres
- 20 metres
- 23 metres
- 26 metres
- 29 metres

Figure 6.2.6.3.3—Cleveland building heights

Capalaba - Building Heights

- 17 metres
- 23 metres
- 29 metres
- 41 metres

Figure 6.2.6.3.4—Capalaba building heights

Noosa

Assessment	Assessment Benchmark
Note: - Noosa council outlines a "transitory accommodation" category, defined in the Noosa Council Revenue Statement. Ratepayers who fall in this category are subject to the rates outlined in the Rating Category Statement of Noosa Council. Note: - For other zones not specified below, an impact assessment is needed with the assessment benchmark being the entire planning scheme	
Low density – Table 5.5.1 Noosa Plan 2020	

Accepted development subject to requirements –
If:
   (a) in the applicant's principal place of residence;
   (b) the letting of only one dwelling on site;
   (c) occupied by short term guests on no more than 4 occurrences in any calendar year; and
   (d) occupied by short term guests for a total of no more than 60 nights in any calendar year.
	Acceptable Outcomes AO2, AO3.2, AO3.3 and AO3.4 of the Low Density Residential Zone Code
	
	Acceptable Outcomes AO5.2, AO5.3, AO7 and
	AO14.1 of the Low Density Housing Code;

Medium density – Table 5.5.2 Noosa Plan 2020	

Accepted Development subject to requirements –
If:
   (a) in an existing building which is the applicant's principal place of residence;
   (b) occupied by short term guests on no more than 4 occurrences in any calendar year; and
   (c) occupied by short term guests for a total of no more than 60 nights in any calendar year.
	Acceptable Outcome AO5.2 of the Medium Density Residential Zone Code

Impact assessment – If not otherwise specified	The planning scheme
High density – Table 5.5.3 Noosa Plan 2020	

Acceptable development subject to requirements –
If:
   (a) not located on a site adjoining or over the road from land within the Major Centre Zone;
   (b) in an existing building which is the applicant's principal place of residence;
   (c) occupied by short term guests on no more than 4 occurrences in any calendar year; and
   (d) occupied by short term guests for a total of no more than 60 nights in any calendar year.
	Acceptable Outcomes AO3.5 of the High Density Residential Zone Code

Impact assessment –
If:
    (a) not otherwise acceptable development; and
    (b) not located on a site adjoining or over the road from land within the Major Centre Zone.
	The planning scheme

Tourist accommodation – Table 5.5.4 Noosa Plan 2020	

Accepted Development –
If:
    (a) in an existing building which is the applicant's principal place of residence;
    (b) occupied by short term guests on no more than 4 occurrences in any calendar year; and
    (c) occupied by short term guests for a total of no more than 60 nights in any calendar year.	

Code assessment –
If not
    (a) accepted development; or
    (b) impact assessable
	Applicable local plan code
	Tourist accommodation zone code
	Visitor accommodation code
	Works code

Impact assessment –
If located:
    (a) within the Hastings Street Mixed Use Precinct;
    (b) on Lot 1 SP286680, 215 David Low Way, Peregian Beach;
    (c) on any Lots SP190823 or SP151409, 35 Morwong Drive, Noosa Heads, (Viridian Noosa Resort);
    (d) on Lots 10 or 11 SP195871, 37 Serenity Close, Noosa Heads (Settlers Cove resort site);
    (e) on Lot Lot 203 SP267424 o Lot 3 SP126203, 94 or 142 Noosa Drive, Noosa Heads (RACV Resort and adjoining land);
    (f) on Lots 201, 8000 or common property on SP290680, 75 Resort Drive, Noosa Heads (Parkridge Noosa);
    (g) on GTP102758, 73 Hilton Terrace, Noosaville (Ivory Palms Resort);
    (h) on SP115731, 3 Hilton Terrace, Tewantin (Noosa Lakes Resort);
    (i) on Lot 2 RP135678, 1 Beach Road, Noosa North Shore;
    (j) on Lot 2 SP186169, 30 Beach Rd, Noosa North Shore;
	The planning scheme

(k) at Lot 500 SP215779, Lot 500 SP186174 or at any of the Beach Road Holiday Homes, 90 Beach Road, Noosa North Shore; or (l) Lot 2 on RP865533, 2 Halse Lane, Noosa Heads (Halse Lodge) (m) on Lot 4 SP 178340, 61 Noosa Springs Drive, Noosa Heads	
District centre – Table 5.5.6 Noosa Plan 2020	
Impact assessment – If: (a) in the Cooroy Local Plan area; (b) on Lot 1 RP845244 or Lot 3 RP40197, Poinciana Ave & Diyan St, Tewantin (Royal Mail Hotel site); or (c) on Lot 2 RP842280 between Mary St and Gibson Rd, Noosaville (Villa Noosa Hotel site).	The planning scheme
Health and Wellbeing Precinct – Table 5.5.6.1 Noosa Plan 2020	
Code assessment – If located on Lots 3 & 4 RP122928, 16 Mary Street, Noosaville	Noosaville Local Plan Code District Centre Zone Code Visitor Accommodation Code Works codes
Local centre – Table 5.5.7 Noosa Plan 2020	
Impact assessment – In conjunction with non-residential uses in a mixed use building	The planning scheme
Community facilities – Table 5.5.11 Noosa Plan 2020	
Code assessment – If: (a) not located on Lot 3 SP246584; (b) in conjunction with an existing educational (c) establishment or hospital on the same site; (d) and (e) accommodating no more than 30 guests.	Applicable Local Plan Code Community Facilities Zone Code Visitor Accommodation Code Works codes
Rural – Table 5.5.13 Noosa Plan 2020	
Accepted Development – If: (a) in the applicant's principal place of residence; (b) the letting of only one dwelling on site;	

(c) occupied by short term guests on no more than four occurrences in any calendar year;and (d) occupied by short term guests for a total of no more than 60 nights in any calendar year	
Code assessment – If: (a) located on a site with an area of at least 4 hectares; and (b) not incorporating conference or function facilities; and (c) within a dwelling house no more than five bedrooms; or (d) within no more than four free standing cottages, cabins or permanent tents, accommodating no more than eight guests.	Rural Zone Code Visitor Accommodation Code Works codes
Impact assessment – If: (a) not otherwise acceptable development or code assessment; and (b) not incorporating conference or function facilities.	The planning scheme
Rural residential – Table 5.5.14 Noosa Plan 2020	
Accepted development subject to requirements – If: (a) in the applicant's principal place of residence; (b) the letting of only one dwelling on site; (c) occupied by short term guests on no more than 4 occurrences in any calendar year; and (d) occupied by short term guests for a total of no more than 60 nights in any calendar year	Acceptable Outcomes AO1.1 and AO1.3 of the Rural Residential Zone Code
Impact assessment – If: (a) not otherwise acceptable development; and (b) not incorporating conference or function facilities.	The planning scheme

A brief on short-term accommodation for Noosa is provided. The following makes references to the Noosa Plan 2020 and the short-term accommodation guide provided by Noosa Council 15 Oct 2020.

Short-term accommodation:
The *Planning Regulation 2017* and Noosa Plan 2020 introduce a new definition of short-term accommodation for certain types of visitor accommodation.
Short-term accommodation:
      (a) means the use of premises for:
            (i) providing accommodation of less than three consecutive months to tourists or travellers; or
            (ii) a manager's residence, office or recreation facilities for the exclusive use of guests, if the use is ancillary to the use in (i); but
      (b) does not include a hotel, nature-based tourism, resort complex or tourist park.
For example, this would include the use of an entire dwelling (whether that's a house, duplex, unit or apartment) for short term holiday letting to guests for periods of less than three months.
Accommodations for visitors in, for example, hotels, nature-based tourism, resort complexes or tourist parks are separately defined uses under Noosa Plan 2020.
The definition of short-term accommodation does not include bed and breakfast style home hosted visitor accommodation (where a resident of a dwelling hosts guests in part of their home). This form of visitor accommodation is separately defined as a home-based business.
If the letting of a dwelling is more than three consecutive months to the same person/s, then this is not short-term accommodation.

Planning Approval:
Planning approval may be required depending on the zone the property is located in. Noosa Plan 2020 identifies whether short-term accommodation is considered 'consistent use' or 'inconsistent use' in each zone, whether planning approval is required and the level of assessment required.

If short-term accommodation is identified as 'consistent use' in a zone, then it is considered appropriate use in that zone, provided it does not adversely impact the surrounding amenities that are enjoyed by the permanent residents of the area. Any use that is not considered 'consistent use' is therefore 'inconsistent use'.

Level of assessment:
Accepted development:
Where short-term accommodation is identified as accepted development, then no planning approval is required

Accepted development subject to requirements
Where short-term accommodation is identified as accepted development subject to requirements, the nominated requirements in the applicable codes must be met and no planning approval is required.

Code assessment:
Where short-term accommodation is identified as code assessment, a planning approval is required, and the identified requirements along with the applicable codes of the Noosa Plan 2020 must be met. However, no public notification is required.

Impact assessment:
Where short-term accommodation is identified as impact assessment, a planning approval is required. The application is assessed against the entire Noosa Plan 2020. Public notification is required and third-parties have the right to make submissions regarding to the application.

Brief table of category of development in each zone

Zone	short-term accommodation is the principal place of residence and max of 60 days and not exceed 4 occurrences per year	short-term accommodation of dwelling on frequent or ongoing basis	Motel/backpacker accommodation
Low density residential	Accepted development subject to requirements	Inconsistent use Impact assessment	Inconsistent use Impact assessment
Medium & high density residential	Accepted development subject to requirements	Consistent use Impact assessment	Consistent use Impact assessment
Tourist accommodation	Accepted development	Consistent use Code assessment	Consistent use Code assessment
Rural residential	Accepted development subject to requirements	Consistent use Impact assessment	Consistent use Impact assessment
Rural	Accepted development	Consistent use Code assessment	Consistent use Impact assessment

Existing use rights:
Prior to Noosa Plan 2020, many properties were lawfully established for short-term accommodation. These properties had approval for visitor accommodation or where no approval was required, had commenced use as short-term accommodation. These properties therefore have 'existing use rights' provided they could show evidence of short-term accommodation use prior to Noosa Plan 2020. The intent to commence use as short-term accommodation is not sufficient, it should show this activity had commenced prior to Noosa Plan 2020. Noosa Shire Council assess lawful existing use rights and if they exist on a case-by-case basis. An "Existing Use Short-Term Accommodation – Written Advice Application Form" should be completed and submitted along with the fees and charges outlined by the Fees and Charges Schedule.

Local Law: October 2021
An amendment to local law was made in Oct 2021, commencing on 1 February 2022, that all existing and new properties operating short-term accommodation (and home-based accommodation) must submitted a one-off application, unless exempt. Annual renewal of the approval is required should

property continue to operate as short-term accommodation. For further details, please see Noosa Shire Council Administration (Amendment) Subordinate Local Law (No. 1) 2021.