



**Respondent No:** 1

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 11, 2020 14:28:19 pm

**Last Seen:** Nov 11, 2020 14:28:19 pm

**IP Address:** n/a

Q1. **Name** marie lawton

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

somewhat

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The multi modal plan for our railway corridor is not likely to happen in the near future. Please consider a stand alone rail trail as other councils are doing in the Northern Rivers. Funding is possible and the rail trail will attract the type of visitors we are looking for. "Byron Shire welcomes visitors and supports a visitor economy that cares for and respects our residents, creates low-impact visitor experiences, protects our natural environment, celebrates our cultural diversity and shares our social values". "A Council-led strategy for Byron Shire would endeavour to change the visitor mix, manage visitor behaviour and attract visitors who respect our community and environment, stay longer, are low impact, and want to explore various towns and villages within the Shire. These are the visitors we want to attract; those who share our community values". In 2012 I spoke at a community meeting about alcohol fuelled violence in Byron Bay. I suggested that a Rail Trail running through the Northern Rivers Region would attract a different kind of visitor.. One that would be healthy, active, interested in exploration of nature and adventure and would also spend money in the out lying towns and villages. 8 years later we have managed to secure funding for 2 council areas and are hopeful for a third with new funding available. Construction will begin next year. Unfortunately Byron Shire has not embraced this project and instead is pursuing a dream of having a train return. If this were possible it would need to be funded privately and in my opinion is highly unlikely and unnecessary. Many more people will use a rail trail - being free, flexible, carbon neutral and possible! State and Federal politicians are supportive of rail trails as the recent legislation change has shown.

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Q6. **Additional feedback**

not answered

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**Respondent No:** 2

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 11, 2020 15:33:54 pm

**Last Seen:** Nov 11, 2020 15:33:54 pm

**IP Address:** n/a

Q1. **Name** Carolyn Adams

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Partly

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The pursuit of a rail trail needs to be prioritised to align with our neighbouring councils. We should be pursuing a stand-alone rail trail and stop tainting the process with this ideological dream of rail and trail.

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Q6. **Additional feedback**

Not only will a rail trail welcome visitors who respect residents and the environment and create a low-impact footprint which benefits most of the Shire; the benefits to the existing residents will be overwhelmingly positive also.

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**Respondent No:** 3

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 11, 2020 16:06:21 pm

**Last Seen:** Nov 11, 2020 16:06:21 pm

**IP Address:** n/a

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Q1. **Name** Tim Shanasy

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No, it has a major flaw in it.

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

On page 64 of the SVS document, it states that the track terrain of the Santa Fe Rail with Trail, is similar to that of Byron Shire. This is an error of grand proportion, as Santa Fe is hard, sparsely vegetated and dry, with an average annual rainfall (plus snowfall) over 65.7 days, of just 360.3mm of precipitation. I strongly support the adoption of the fast developing Northern Rivers Rail Trail alone, on our disused rail corridor, as any multi use with a rail service is simply not possible without massive cost to reshape the majority of the landscape, which would require additional land acquisition from many adjoining landowners, in order to verify safety and adequate high rainfall drainage and tunnels and bridges trail diversions. The Northern Rivers Rail Trail is shaping up to be a global eco-tourism draw-card alongside our magnificent coastal attraction. It is already under development in all shires except Byron Shire, yet Byron Shire stands to be the major beneficiary, by far. Byron Shire urgently needs to re-think its rail corridor's viabilities and take advantage of the pace and ease within which it can get on board to benefit from this enormously desired attraction with minimal infrastructural impact and vehicular congestion.

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Q6. **Additional feedback**

Don't miss-out any longer !!

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**Respondent No:** 4

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 11, 2020 16:55:33 pm

**Last Seen:** Nov 11, 2020 16:55:33 pm

**IP Address:** n/a

Q1. **Name** Christian Mangold

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

I believe that the SVS is still relevant and current in general but to my mind the "Multi Use Byron Shire Rail Corridor" (p64) is not feasible in the near future and there is no funding available. This project would be extreme expensive and the maintenance as well. A rail trail is possible soon and meets all the criteria for the type of tourist we want to attract! We would prefer the rail trail anyway. Of course you will find lots of solutions on the whole world and you can discuss this options again and again but this will be a never ending story and we think we should decide an option that can be implemented as soon as possible!

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

No I dont believe.

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Q6. **Additional feedback**

not answered

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**Respondent No:** 5

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 12, 2020 14:40:04 pm

**Last Seen:** Nov 12, 2020 14:40:04 pm

**IP Address:** n/a

Q1. **Name** Geoff Meers

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Yes, multi-use transport corridor

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

We live in a time of dramatic change in our institutions. Bushfires tell us urgent action on climate change is needed now. COVID tells us we need urgent employment opportunities. The Federal Government has discarded the long held abhorrence of debt and embraced social support. Byron Council can also change in response to these events. The only project to provide immediate action on climate change is the rail trail. Getting users out of cars and walking/cycling will reduce carbon. Planting trees on the disused corridor will reduce carbon. And, it will also provide much-needed wildlife links. The rail trail will provide immediate jobs during pre-construction and construction. And even more jobs in the medium term as more, higher-spending tourists come to the region. And it gives the locals somewhere safe to walk and cycle. SO, delete the multi-use option and replace it with the rail trail.

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Q6. **Additional feedback**

There is no comparison with Santa Fe corridor: climate, landscape, rainfall, demand. Who's idea was that? Byron can not have both. Support the rail trail

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**Respondent No:** 6

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 13, 2020 10:13:23 am

**Last Seen:** Nov 13, 2020 10:13:23 am

**IP Address:** n/a

Q1. **Name** Patrick Knight

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The following need to be deleted. The vision is flawed and needs to be amended to add more conditions to the "welcoming of visitors". The level of visitation is too high and needs to be minimised. The following actions are disputed: Theme 1 Leadership etc Action 1 requires more involvement by the people most affected ie the residents of Byron Bay town. Theme 2 Repositioning etc Actions 1, 2, 4, 5 requires more involvement by the people most affected ie the residents of Byron Bay town. Theme 4 Events Action 1, should include controls to limit the number and size of events having regard to negative amenity impacts on residents. The event industry already has too much power and has no regard for the amenity of residents. Action 2, must also involve impacted residents, industry already has too much influence. Action 5 - Impacted residents need to be properly consulted to determine if they want Byron Shire to be "a leading business and events and conferencing destination" Theme 5 Transport etc Action 1 b - Totally disagree. Council should not be involved in the railway business. The MURC study was fundamentally flawed, there was no transparency regarding its brief, the conclusions and economic analysis are flawed as there was no credible demand modelling or infrastructure condition analysis. The Casino to Murwillumbah Rail corridor should be converted to an on formation rail trail for its entirety to provide a valuable recreational, health and active transport facility for the whole community. The proposed toy train in the MURC study would only ever be a tourist ride run by private interests. It would deny public use of the railway for community active transport. Council has already wasted hundreds of thousands of ratepayers money on the foolish MURC study and now wants to waste even more. Time to stop this nonsense and support the rail trail on formation. Theme 6 Planning for visitor accommodation Strategies Agree. This area needs to be strengthened to eliminate short term holiday accommodation from residential areas. Actions 1. Agree, but criteria needs to be tightened to restrict to max 30 days per year 4. Should be regularly monitor and control ....

Q6. **Additional feedback**

Paper is too long and likely to be not read or comprehended by many residents due to its size. I believe this whole engagement process is flawed as it fails to engage with most residents



**Respondent No:** 7

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 13, 2020 14:30:17 pm

**Last Seen:** Nov 13, 2020 14:30:17 pm

**IP Address:** n/a

Q1. **Name** Heather Whitely

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Other (please specify)

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

No

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Q6. **Additional feedback**

not answered

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**Respondent No:** 8

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 13, 2020 17:01:37 pm

**Last Seen:** Nov 13, 2020 17:01:37 pm

**IP Address:** n/a

Q1. **Name** Anna Molloy

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

The SVS is not relevant if it continues to consider a combine rail and bike trail. Both sections of the rail trail from Murwillumbah to Crabbles Creek and Eltham to Casino are going ahead. To not continue this through Byron Shire at a similar standard is ridiculous. The potential for a continuous 134km bike trail will bring loads more visitors of the type Byron wants! Howabout comparing it to the Otago rail trail rather than a 'rail with trails' example in the US which is not practical in the proposed locations?

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The concept of 'rail with trails' is just not practical for the section of line between Byron and Mullum. A combined rail and bike path can not be safely constructed on the existing embankments and bridge crossings.

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Q6. **Additional feedback**

not answered

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**Respondent No:** 9

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 13, 2020 20:03:08 pm

**Last Seen:** Nov 13, 2020 20:03:08 pm

**IP Address:** n/a

Q1. **Name** Patricia Hale

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Other (please specify)

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Absolutely yes.

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

I believe that given the vision of the SVS - · Positioning Byron Shire as a leading sustainable destination with a protected landscape, rich history and vibrant community; · Positioning Bangalow, Byron Bay, Brunswick Heads, Ocean Shores, Mullumbimby, and the Byron Hinterland as key hubs offering; arts and cultural experiences; health and wellness product; walking trails; food trails; entertainment experiences and heritage attractions. that the development of a rail trail provides opportunities for the expansion of 1. village specific economic development 2. health and wellness experiences and products 3. food products and services 4. entertainment experiences 5. heritage attractions and experiences 6. indigenous attractions and experiences 7. arts and cultural experiences, and 8. dispersment of market segment demand outside Byron Bay CBD.

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Q6. **Additional feedback**

not answered

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**Respondent No:** 10

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 13, 2020 21:35:50 pm

**Last Seen:** Nov 13, 2020 21:35:50 pm

**IP Address:** n/a

Q1. **Name** Jennifer Gray

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Yes

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The Casino to Murwillumbah railway line needs to be converted to a rail rail, not a multi-purpose track which includes a train or tram. Rail trails are popular with residents and tourists everywhere. The Northern Rivers Rail Trail is supported by the NSW Government as shown in the recent legislative change to the status of the land, thus guaranteeing government funding for the rail trail project. There is no promised funding for a train or tram.

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Q6. **Additional feedback**

not answered

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**Respondent No:** 11

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 14, 2020 12:34:16 pm

**Last Seen:** Nov 14, 2020 12:34:16 pm

**IP Address:** n/a

Q1. **Name** Wendy Boyd

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Not in this year of a pandemic, 2020, when there has been few international tourists. Byron Bay has experienced a huge surge in domestic tourist, there have been no late party bars which has quietened the nights down significantly (I live in town). The town overall is darker and quieter at night, and illustrates the potential of having "shared community values" as identified on page 55 In the front half of the document there is a focus on "shared community values" for the shire. This gets lost once the economic activities of arts and crafts, events and accommodation is presented later in the document. Yes please place a focus on the impact of "tourism" on the environment of the shire. And work towards finding a balance between economic activities with caring for the environment. Currently this is not happening: for example Byron Bay has a huge focus on attracting more tourists. But improve the infrastructure of the town so that the environment is minimally impacted- for example many tourists like to buy takeaway dinners, and eat at their paid accommodation. It is suggested that tourists take their own containers to pick up their food instead of the current practice of using single use throw away containers that are usually coupled with throwaway knife and forks and multiple paper serviettes. What happens with these single use containers is that they get discarded in the 'red bins' and may stay there for up to 13 days before bin collection occurs. Bins are then disgusting, and often are able to be opened by the native wildlife spilling soiled contents for the neighbours to have to tolerate. The same practices occur at festivals- the shire suffers significantly from all of this tourist created waste. Ensure that 'nothing goes to waste' is an approach taken throughout the shire On page 55 there is a strategy to attract people who have 'shared community values'- whose community values do you mean: Is it the people who are looking to make money within the shire from the tourist market? Or is it the residents who live in the towns and whose values are to enjoy the beauty of the towns? Unfortunately the residents are rarely considered when it comes to making money in the shire. Sure let's have tourists who are for the environment "the right type of tourist" as noted in the document. How on earth will this ever be done? This is aspirational and will not be possible to enforce. The 3am party bars needs to be closed down do not align with shared community values. The only people who benefit are the liquor industry, the owners of the party bars and associated workers, and one could argue the police, as they are needed to ensure safety of the town PAGE 64 The idea of having a multimodal transport link between towns on the railway line should be abandoned. There are no funds available for re-introducing light rail as proposed by some councillors. Instead focus on building a rail trail that can be used for public transport. Many people will use the trail to move from town to town fro work reasons. Page 65- what is the "bike strategy"? as an action- I could not locate what this means? PAGE 69 Make short term holiday letting only possible if the owner/agent lives on site and set up compliance that this is happening. Owners of letting properties need to be responsible for the impact of their business on the neighbourhood 24/7. and not jsut from 9am to 5pm as the new Code of Conduct identifies released by the NSW state government recently. This does not happen currently in Byron Shire.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The document is poorly designed to attract optimal responses from readers. It is difficult to find the 'strategies' or 'actions' in the document. There should be an index of these for comment. This survey is also sub-optimal- come on Byron Shire you can design something better than this to obtain authentic feedback from the ratepayers.

**Q6. Additional feedback**

The resilience of the tourist industry is strong in Byron Shire- it is apparent that throughout the 2020 pandemic the shire has prospered from the visitations of domestic tourists. It would be fantastic to see the shire caring similarly for the residents of the towns and rural areas that are significantly impacted by tourists. Weighing up the balance between making money/ providing jobs and caring for the environment and residents is a challenging task

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**Respondent No:** 12

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 14, 2020 17:40:22 pm

**Last Seen:** Nov 14, 2020 17:40:22 pm

**IP Address:** n/a

Q1. **Name** Neil McKenzie

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

The idea of a multi-modal corridor as outlined on page 64 is unrealistic in the Byron Shire. It may work in highly populated areas with a wide corridor and serving an obvious commuter function. The corridor should be converted to an exclusively walking/rail trail linking with the rest of the corridor in the neighbouring shires and completing the Murwillumbah to Casino rail/trail which is due to get underway next year. This would enable locals, at all levels of physical ability, to move around the shire at will and off the roads. It would be a drawcard to tourists of all ages from around the country and indeed the world to experience the attractions of the north coast of NSW without contributing to traffic problems which are already a major issue. The idea of a light rail between villages in the Byron hinterland is totally fanciful and uneconomic. Trains would cross roads thus increasing the traffic chaos and causing greater risk of death and injury. They also only serve a small section of the population who live near the line. Public transport is important but the most efficient by far is fleets of small buses which can go anywhere, ideally on dedicated lanes which other traffic cannot use. The completed rail trail would be the greatest single tourist attraction this area has ever devised and also serve the spread visitors out into the surrounding hinterland rather than focussing totally on Byron itself. In fact it would be one of the most iconic rail trails in the world greatly stimulating the local economy and having minimal impact on the natural environment.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

No comment

Q6. **Additional feedback**

Not at this stage.



**Respondent No:** 13

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 15, 2020 21:10:19 pm

**Last Seen:** Nov 15, 2020 21:10:19 pm

**IP Address:** n/a

Q1. **Name** Peter Hatfield

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No it is not fully relevant and current in one significant aspect. Its discussion on the multi use of the rail corridor is not evidence based. While the ARCADIS report suggested a path beside rails was possible because of the width of the corridor it did not investigate the engineering issues associated with it. This strategy states that: "These rails-with-trails are safe and increasingly common right around the world", but the far more relevant engineering advice informing the development of the rail trail in adjoining shires has been that in our mix of both very steep hilly and low flood plain terrain transversed by multiple bridges and in some places long tunnels, it is not feasible. I note ARCADIS could not recommend any way to construct a trail beside the rail between Billinudgel and Mullumbimby. It is quite questionable if a community path beside rail is likely to be a feasible option. In their January 2020 draft of the Shire Transport Strategy the consultants note they were told by Transport for NSW that the NSW Government will not fund any rail service. That draft they did not recommend any rail solution in the two five year periods it considered, noting only that the Shire was looking for a "strategic partner" to reactivate the corridor for rail, without any suggestion of how many years that could take nor any suggestion it would be possible within the coming decade which the transport strategy also covers. The NSW Government has shown it is willing to fund community paths - rail trials - on disused corridors where there is community support. The community path through Byron Shire was identified in its PAMP/Bike Plan consultations as a high priority and is shown in the Bike Plan as a priority A. A community walking and cycling path along the rail corridor forms part of a 130km Casino Murwillumbah Northern Rivers Rail Trail, and the first two stages have received funding, and construction will start in 2021. The path through Byron Shire is important to complete a multi day walking and cycling experience. Longer trails involving overnight accommodation spending are of higher economic value, and a path through the Shire would contribute visitor benefits to the Shire but also add substantial value the regional tourist economy and so add to the Shire's reputation as the lead LGA in the regional tourist economy . The nature of the experience is that visitors walking and cycling from the Tweed or Casino through the Byron area would not bring the traffic, pollution or carbon footprint issues of other visitors, and probably fewer of the anti-social issues (most will be too tired to other than sleep, and save any celebrating until Casino or Murwillumbah!). The business case for a community path on the corridor would be much less expensive than examining rail activation (stage two of the rail trail cost \$75,000, which was crowd funded mainly by the Northern Rivers community) . I suggest the sustainable tourism strategy note the attractiveness and fit of cycle and walking tourism with Byron values , the high value and low environmental impact of a path a long the rail corridor, the shorter time frame and likelihood of funding being available for investigating and building it, and its priority in the community generated bike plan. I suggest the strategy could recommend examining a path on the corridor as a priority sustainable tourism investment, and noting the string wish in some parts of the community to reactivate the corridor for rail, a study on a path could include clearing the corridor and examining the in detail feasibility of building the path beside the rail formation. It may also wish to note that that would enable an easier examination of the rail infrastructure for future rail activation. The strategy could also note that there are other important opportunities to promote cycle tourism in the Shire, on quieter roads, and on the Shire's growing urban mixed use path network.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The strategy could note that there was a growth in interest during Covid 19 in active tourism and recreation, including surf tourism and cycling and walking.

Q6. **Additional feedback**

Thanks for the opportunity to comment on this. The Northern Rivers is an increasingly regional economy and community and I hope the strategy takes a truly regional approach to sustainable visitation .

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**Respondent No:** 14

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 16, 2020 11:43:48 am

**Last Seen:** Nov 16, 2020 11:43:48 am

**IP Address:** n/a

Q1. **Name** Richard White

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Sustainable Visitation should include ACHIEVABLE. Who has submitted any business plan with financial costings that any form of rail travel is affordable after the huge set up costs?

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Get behind the rail trail now so local residents can have this unused corridor revitalised and become a usable asset NOW

Q6. **Additional feedback**

Achieve, is more beneficial than 16 year old dreams that have now realistic chance of happening. Preserve the corridor for future transport options but USE IT NOW





**Respondent No:** 15

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 19, 2020 08:38:10 am

**Last Seen:** Nov 19, 2020 08:38:10 am

**IP Address:** n/a

Q1. **Name** Sue Franklin

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Yes

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

No I work in an art gallery in bangalow and business is booming. It's impossible to get a tradie as they are all flat out building new homes and getting holiday rentals ready for the onslaught Every member of my family has picked up extra work and we are in fact over employed whilst still being negatively impacted by over tourism.

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Q6. **Additional feedback**

We need to see what happens when the Victorian border reopens. I believe we actually have enough residents to support most businesses now. Covid is an opportunity to try and achieve the unicorn known as sustainable tourism. Byron has been very well promoted but now it's enough. Let's take a breather!

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**Respondent No:** 16

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 25, 2020 09:05:03 am

**Last Seen:** Nov 25, 2020 09:05:03 am

**IP Address:** n/a

Q1. **Name** Michael Murray

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Q2. **Email**

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Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Yes

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

No

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Q6. **Additional feedback**

Keep up with trying to introduce a voluntary bed tax. Educate people that eliminating Airbnb will not solve the affordable housing issue.

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**Respondent No:** 17

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 11:59:16 am

**Last Seen:** Nov 27, 2020 11:59:16 am

**IP Address:** n/a

Q1. **Name** Belinda Kirkwood

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Business owner/operator  
Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

See below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Beach Byron Bay a 110 seat restaurant located on the waterfront at Clarkes Beach in Byron Bay and we have been operating and living in Byron Shire for 23 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend

\$102 on average. The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following: • A venue for a special occasion • A venue for lunch or dinner • A morning coffee and breakfast from our kiosk in the park Servicing the STRA industry accounts for 45% of our business revenue and we employ 55 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 100% and we had 25 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. 25 of our staff will lose their job 2. 25 of our staff may have to move out of the Northern Rivers, relocating their families 3. Our business will lose 35% revenue and will be forced to downsize The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Councils meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Governments recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Belinda Kirkwood Owner and Director, Beach Byron Bay

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**Q6. Additional feedback**

See above

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**Respondent No:** 18

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:02:57 pm

**Last Seen:** Nov 27, 2020 12:02:57 pm

**IP Address:** n/a

Q1. **Name** Suzanne Campbell

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

See below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Byron Bay Holiday Hire and we have been operating and living in Byron Shire for 30 years and our family has been in the area for over 4 generations. We are writing in response to the Byron Shire Council's Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend

\$102 on average. The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following: • Linen • Baby item hire (cots, high chairs, strollers) • Additional bedding • Beach item hire (beach towels, beach chairs) Servicing the STRA industry accounts for 100% of our business revenue and we employ 8 FTE staff and 4 additional casual staff, all of whom are local residents with families of their own and mortgages to be supported by our business. During the CoVID travel restrictions, business revenue dropped by 90% and we had 10 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. 35% of staff will lose their jobs 2. These same staff would likely be forced to move out of the area due to being unable to meet mortgage or rental obligations. This will have a dramatic impact on the family of our staff 3. Our business will lose 35-40% of revenue and will be forced to downsize dramatically The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Suzanne Campbell Proprietor Byron Bay Holiday Hire

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Q6. **Additional feedback**

See above

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**Respondent No:** 19

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:06:16 pm

**Last Seen:** Nov 27, 2020 12:06:16 pm

**IP Address:** n/a

Q1. **Name** Conor Reilly

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Q2. **Email** [REDACTED]

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Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

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Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

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Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Fantastic Plumbing Pty Ltd, we have a local maintenance plumbing operation and have been operating and living in Byron Shire for 3 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.



The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following: • Emergency blockages • Emergency hot water issues • General maintenance of plumbing of properties in the portfolio Servicing the STRA industry accounts for 20% of our business revenue and we employ 5 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 23%. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. 1-2 staff will lose their jobs (including 1 apprentice) 2. 1-2 staff may have to move out of Byron Shire 3. Our business will lose 20-30% of revenue forcing downsizes The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Conor Reilly Director Fantastic Plumbing

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**Q6. Additional feedback**

As above

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**Respondent No:** 20

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:33:08 pm

**Last Seen:** Nov 27, 2020 12:33:08 pm

**IP Address:** n/a

Q1. **Name** Janelle Montano

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Your Luxury Escape, Luxury Holiday accommodation and we have been operating and living in Byron Shire for 3 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- We provide luxury accommodation for holiday makers
- We employ the services of contract cleaners (approximately 60 people)
- Many other trades we call on daily include: o Plumbers o Electricians o Painters o Photographers o Pest Control o Window Cleaners o Linen Hire o Laundromats o Home Stylists o Tourist Operators o Hospitality o Chefs o Babysitters

The percentage of noise complaints we have received in the last 12 months has been 0.35% or 2 complaints from 576 bookings. Servicing the STRA industry accounts for 100% of our business revenue and we employ 5 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 90% and we had all of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 4 out of 5 staff will lose their jobs
2. Our business will not survive as we will only have guests for 3 months of the year. This is unsustainable.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Janelle Montano Manager, Your Luxury Escape

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Q6. **Additional feedback**

As above

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**Respondent No:** 21

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:38:41 pm

**Last Seen:** Nov 27, 2020 12:38:41 pm

**IP Address:** n/a

Q1. **Name** Michael Thurston

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

27 November 2020 To whom it may concern, RE: Letter of support for Short-Term Rental Accommodation industry against Byron Shire Councils 90-day planning proposal Destination North Coast (DNC) is one of six regional tourism entities that have been established to drive the growth of the visitor economy in Regional NSW. Based in Lismore, as the lead tourism agency, Destination North Coast oversees tourism development and management in the region from Mid-Coast to Tweed Heads including Lord Howe Island. DNC oppose the proposed 90-day cap on short-term holiday rentals. Having reviewed the proposal we believe that it will have a wide-reaching negative impact on the visitor economy to the shire whilst not significantly assisting in the goal of securing more properties for permanent rental. The proposed cap will limit viable and community minded operators' ability to attract visitors whilst the majority of owners will continue to holiday let their properties, resulting in a reduced visitor economy and relatively stagnant permanent letting pool. Short-term holiday rentals are a vital component of the Byron Shire visitor economy making up a large and the most flexible component of the accommodation stock for visitors. Contrary to the way the sector is often depicted short-term holiday letting predominately cater to high value and sensitive visitors to the region. In turn, these visitors then support a wide array of local businesses and employment opportunities. By limiting operators, who adhere to industry guidelines, ability to trade will impact the businesses they support and employment opportunities for local residents. The recently introduced code of conduct for short-term holiday accommodation which DNC is supportive of, will be the most effective tool in removing operators who do not meet expected standards of operation. Removing owners and operators who do not meet the code of conduct will eradicate the bulk of complaints against the sector and be far more impactful in securing additional properties for permanent letting. Based on the anticipated positive impacts of the code of conduct and negative impacts to the visitor economy, local businesses and employment opportunities within the Byron Shire, caused by an artificial cap on short-term holiday accommodation, DNC is opposed to the planning proposal. Please contact us if you would like to discuss the matter in more detail. Kind regards, Michael Thurston General Manager

Q6. **Additional feedback**

As above



**Respondent No:** 22

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:45:05 pm

**Last Seen:** Nov 27, 2020 12:45:05 pm

**IP Address:** n/a

Q1. **Name** Felicity Scott

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Seven in Style, Interior Styling and Design and we have been operating and living in Byron Shire for 11 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Project manage building and renovations for owners
- Source local furniture, art, homewares and furnishings for properties
- Outsource staff for installation, gardening, electrical and maintenance

Servicing the STRA industry accounts for 98% of our business revenue. During the CoVID travel restrictions, business revenue dropped by 100%. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

- Our business will lose 99% of revenue and be forced to downsize or close. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Felicity Scott Seven in Style

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**Q6. Additional feedback**

As above

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**Respondent No:** 23

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:48:18 pm

**Last Seen:** Nov 27, 2020 12:48:18 pm

**IP Address:** n/a

Q1. **Name** Amanda and Scott Kenyon

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Byron Quality Linen and we have been operating our current business in Byron Bay for 10 years and living in Byron Shire for 35 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.



The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Commercial linen hire to holiday houses, apartments, guest houses and AirBnB's

Servicing the STRA industry accounts for 100% of our business revenue and we employ 7 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 70% and we had 2 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 7 people employed by our business will lose their income, including us as owners
2. As this is our sole source of income, we as owners of the business would likely lose our home
3. We would lose more than 70% of our income, if not all

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Amanda and Scott Kenyon Byron Quality Linen

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**Q6. Additional feedback**

As above

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**Respondent No:** 24

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:52:26 pm

**Last Seen:** Nov 27, 2020 12:52:26 pm

**IP Address:** n/a

Q1. **Name** Ray Shannon

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business, Byron Bay Taxis and Limousines Pty Ltd provides taxi services to the Byron Shire and we have operating and living in Byron Shire for 29 years. We are writing in response to the Byron Shire Council's Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend

\$102 on average. The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Taxi services to and from Ballina and Coolangatta airports
- Taxi services during the day to various points of interest within the Shire
- Taxi services to and from restaurants, bars and late-night entertainment outlets

Servicing the STRA industry accounts for 40% of our business revenue and we engage 30 drivers, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 30%. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 30% of drivers will lose their jobs
2. Our business will lose 30% of revenue and be forced to further downsize impacting the local business community who we engage to keep the fleet on the road, mechanical repairs, service stations etc.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Ray Shannon Administration Manager Byron Bay Taxis and Limousines Pty Ltd

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**Q6. Additional feedback**

As below

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**Respondent No:** 25

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:56:22 pm

**Last Seen:** Nov 27, 2020 12:56:22 pm

**IP Address:** n/a

Q1. **Name** Tiffeny Welsby

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, We are a licensed, specialist property management agency operating in Byron Bay. We manage and act as a booking agent for a large number of hosted and non-hosted STRA properties in the Byron Shire. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within Byron Shire. In 2018 domestic overnight tourists spent \$571m in the Byron Shire, compared to \$100m by day-trippers and \$97m by international tourists. On a per day, per capita basis, domestic overnight tourists spent \$458,

whilst day-trippers spent \$100 and international tourists \$139. While we acknowledge and support the need for more effective regulation of STRA, we consider the State Planning Department's recently announced Code of Conduct (together with Byron Bay's existing HLO Code) provides a sufficient framework to address reasonable community concerns about the impact of STRA on residential areas. We see no basis to reduce the regional limit for non-hosted STRA from 365 days. Council's proposed 90 day limit is arbitrary, draconian and will, in our submission, be ineffective in either addressing residents' desire for noise abatement or significantly increasing the supply of long term rental accommodation. Furthermore, the 365 day precincts proposed at Council's meeting on 19 November is an illusory concession in our submission. The precincts arbitrarily and unreasonably restrict property use throughout the bulk of Byron Bay. In our experience, community concerns regarding STRA stem mainly from noise complaints arising from properties (hosted and unhosted) which are poorly managed. Not from the number of days a property is occupied or its proximity to the beach. Typically, an excessive number of guests are permitted on the premises and no screening or oversight is provided to manage behaviour at the property. Therefore, the Codes approach of registration and a behavioural 'two strikes and you're out' policy (with reasonable safeguards) appropriately punishes the unscrupulous owner/manager while permitting well managed properties (the overwhelming majority) to continue to operate. Since 1 January 2020, having professionally managed an estimated 9,000 STRA nights, we have dealt with 9 noise complaints. These complaints were effectively processed by our management team via the HLO complaints process and none resulted in a second incident. We manage both STRA and long-term rental properties in Byron Bay. Contrary to popular belief, in our experience most owners do not make the decision as to whether to let long or short term based on yield. Nor do owners who choose to short-term let generate substantially higher yields, net of costs, than long-term rentals. In our experience, the decision is more often based on an owner's intention to personally use the property for their own vacations. Therefore, we do not expect arbitrarily restricting short-term rentals to 180, or even 90, days to significantly increase long-term rental supply. This can only be properly addressed by increased dwelling supply. Our business Holiday Property Management division trades as 'Byron Bay Accom', which has been operating in the Byron Shire for over 20 years. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Holiday Property Management
- Employ the services of over 20 contract cleaning businesses
- Employ the services of over 40 tradespeople
- Referral of guests to tourism and hospitality operators
- Sponsorship of local events (e.g Writer's Festival and Triathlon)

Servicing the STRA industry accounts for 80% of our business revenue and we employ 9 staff, all of whom are local residents. During the CoVID travel restrictions, business revenue dropped by more than 30% and we had 7 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact on our business and the tourism industry as experienced during CoVID, however these impacts will be longer lasting and potentially devastating to our business. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at the Council meeting on 19/11/20), the following impacts will result:

- At least 40-50% of our staff will lose their jobs
- Our business will support far fewer cleaners and tradespeople
- Staff and service providers may have to move out of Byron Shire, relocating their families
- Our business will lose an estimate of 60% of holiday management revenue and be forced to significantly downsize or close.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the

remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Councils meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Governments recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Tiffeny Welsby Licensee / Manager – Byron Coastal Real Estate

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**Q6. Additional feedback**

As above

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**Respondent No:** 26

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 12:58:44 pm

**Last Seen:** Nov 27, 2020 12:58:44 pm

**IP Address:** n/a

Q1. **Name** Sonya Brien

Q2. **Email**



Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Style Hive Design that operates in Byron Shire. We focus mainly on holiday letting properties assisting owners to renovate and style their properties. We have been operating for 2/5 years and living in Byron Shire for 40 years. We are writing in response to the Byron Shire Council's Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron.



Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Assisting with renovating and improving properties
- Appointing local trades to assist with the above items
- Styling properties and using many local suppliers for furnishings and locally made items

If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 90% of business would be lost
2. The ripple effect to local business and trades would then be impacted
3. Property owners wouldn't be able to keep their properties well maintained and looking presentable in the community

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Sonya Brien  
Owner, Style Hive Design

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**Q6. Additional feedback**

As above

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**Respondent No:** 27

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 13:03:15 pm

**Last Seen:** Nov 27, 2020 13:03:15 pm

**IP Address:** n/a

Q1. **Name** James Scott

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Tobys Byron Bay, a house used for holiday rentals and we have been operating and living in Byron Shire for 10 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering accommodation. Servicing the STRA industry accounts for 100% of our business revenue and we employ numerous staff and services, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 75% and we had many of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. Locals will lose their jobs, it's as simple as that. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, James Scott Owner Operator Tobys Byron Bay

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**Q6. Additional feedback**

As above

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**Respondent No:** 28

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 13:16:36 pm

**Last Seen:** Nov 27, 2020 13:16:36 pm

**IP Address:** n/a

Q1. **Name** Emily Bello Flores

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Byron Bay Done and Dusted Cleaning Services and we have operating and living in Byron Shire for 8 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following: • Cleaning services • Property maintenance • Linen • Stocking consumables Servicing the STRA industry accounts for 80% of our business revenue and we employ 7 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 70% and we had 7 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. 7 staff will lose their jobs 2. 7 staff may have to move out of Byron Shire, relocating their families etc. 3. Our business will lose 80% of revenue and be forced to downsize / close / etc. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase in high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Emily Bello Flores Owner Operator Byron Bay Done and Dusted

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**Q6. Additional feedback**

As above

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**Respondent No:** 29

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 13:19:23 pm

**Last Seen:** Nov 27, 2020 13:19:23 pm

**IP Address:** n/a

Q1. **Name** Tom Ormerod

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business, Luxico is a luxury home rental business and we have been operating and living in Byron Shire for just under 3 years. We are writing in response to the Byron Shire Council's Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.



The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Providing our Home Hotel concept in 40 homes and attracting affluent international and domestic families to the area who are significant spenders
- Paying over \$1m in local third party services with 40 businesses across cleaning companies, linen hire businesses, trades people, photographers, stylists, yoga services, massage providers and others
- Market Byron Bay as an international destination through luxury travel groups
- Providing concierge to home owners and guests
- Less than 2% of bookings receive noise complaints

Servicing the STRA industry accounts for 40% of our business revenue and we employ 8 staff and indirectly another 80 individuals, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 75% and we had 2 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 6 staff will lose their jobs and a further 80 staff will be impacted
2. 4 staff may have to move out of Byron Shire, relocating their families etc.
3. Our business will lose 70% of revenue and be forced to downsize / close and Luxico will be forced to withdraw from the market.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Tom Ormerod Co-Founder, Luxico

Q6. **Additional feedback**

As above

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**Respondent No:** 30

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 13:22:26 pm

**Last Seen:** Nov 27, 2020 13:22:26 pm

**IP Address:** n/a

Q1. **Name** Juliette Sersansie

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Holiday Rental Services (Registered Real Estate Agent) and we have been operating and living in Byron Shire for 10 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.



The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. Some of our properties we have been renting for 10 years at 80%+ occupancy. Noise fines would over these 10 years be less than 1% of Guest bookings. We deal swiftly and our neighbours have our contact number and Quiet Hotline/HLO number should anything amiss occur. We also evict if tenants are unruly or commit offensive or very late night breaches. We are super strict on this and care of the quiet enjoyment of our neighbours. Servicing the STRA industry accounts for 100% of our business revenue and we employ 3-10 staff, the majority being local residents or travellers intending to stay some months. During the CoVID from April travel restrictions, business revenue dropped by 100% and we had all of our staff on the JobKeeper if eligible, those who weren't had to leave Byron Bay which has now created a huge shortage in the employment pool and has greatly affected my capacity to run a successful highly attentive business. We expect Council's proposed Planning Proposal will have a similar impact on our business and the tourism industry as experienced during CoVID, however these impacts will be longer lasting and potentially devastating to our business. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. All staff could lose their jobs – what are they to do for 9 months of the year with no work 2. All staff could potentially have to move out of Byron Shire, relocating their families etc. 3. Our business will lose 9 months of revenue and be forced to downsize / close. It simply is not sustainable to have such a short period of time to achieve revenue, we have big bills to pay – insurances and the like simply would not be worth operating. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Juliette Sersansie Proprieter, Holiday Rental Services

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**Q6. Additional feedback**

As above

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**Respondent No:** 31

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 13:24:57 pm

**Last Seen:** Nov 27, 2020 13:24:57 pm

**IP Address:** n/a

Q1. **Name** Wendy Bithell

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Vision Walks Eco Tours and we have been operating and living in Byron Shire for 13 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 – Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA

support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- The only land-based advanced eco-tourism accredited business in the Northern Rivers region
- Award winning eco tours
- Walks and wildlife tours (Night Vision Walks, Minyon Falls walk, Wildlife Safari, Platypus Walk, Koala Tour, Nightcap Historic Track Walk and our new multi tour days)
- Byron Hinterland Tours: Beyond Byron, Hippy Trail Hinterland Tour, Crystal Castle Tour, Byron Bay Tour

Servicing the STRA industry accounts for 26% of our business revenue and we employ 4 staff, all being local residents. During the CoVID travel restrictions, business revenue dropped by 30%. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. Decrease in places to stay for my customers by 26%
2. Our business will lose 10% income

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Wendy Bithell Owner Operator Vision Walks Eco Tours

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**Q6. Additional feedback**

As above

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**Respondent No:** 32

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 13:28:18 pm

**Last Seen:** Nov 27, 2020 13:28:18 pm

**IP Address:** n/a

Q1. **Name** Colin Hussey

Q2. [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, A Perfect Stay is a professional short-term rental accommodation property management organisation who manages close to 300 properties across Australia. Originating in Byron Bay and operating since 2004, our largest portfolio remains in Byron Shire. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron.

Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Short term rental accommodation property management
- Employing the services of 160 businesses that either contract or employ hundreds of staff to service our properties
- Paying out over \$4 million to Byron Shire creditors who support the STRA industry in the last year
- Employing the services of tradespeople, including; stylists, pool cleaners, garden maintenance, plumbers, electricians, pest control, painters, builders etc
- Employing the services of aligned businesses such as linen hire, holiday/baby equipment hire, mobile massage and yoga therapists, hardware stores, plant hire, furniture/homeware/appliance stores, local artists etc
- Referring guests to tourism and hospitality operators

Servicing the STRA industry accounts for 100% of our business revenue and we employ 25 FTE staff, the majority being local residents to whom we have paid out more \$1.4m in wages to over the past 12 months. During the CoVID travel restrictions, business revenue dropped by 92% at which point we were forced to stand down all staff and subsequently moved staff to the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. the majority of staff at A Perfect Stay will lose their jobs (25 FTE staff)
2. most of our staff will have to relocate to a metropolitan area to secure employment
3. our business will lose 70% of revenue and will be forced to downsize operations
4. Many of the 160 businesses that support our business and the properties we manage will be heavily impacted resulting in many businesses being forced to downsize and/or close and in-turn ceasing millions of dollars flowing into the local economy. The Byron Shire economy, residents and community thrive on tourism. We at A Perfect Stay are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts, instead owners/landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. Since 11 April 2020, A Perfect Stay has accommodated more than 20,000 guests in Byron Shire, of which 34 calls were made to the Byron HLO. This equates to a (0.0017%) complaint rate. In addition, we would like to reference an excerpt of the testimony that Andrew Hill, Compliance Officer at Byron Shire Council, made at the 2016 Short Term Holiday Letting State Government Legislative Inquiry. This excerpt was recorded on 7 March 2016 and is on the public record: Mr JAMIE PARKER: So how many complaints would you have in a year on those issues? I am not talking about the legality or illegality of short-term accommodation but people complaining about amenity impacts from short-term accommodation properties. Mr HILL: We probably only get of the order of 100 or 200. I do not have the statistics with me. We do have those statistics. Mr JAMIE PARKER: That is a ballpark figure. That is all right. Mr HILL: The environmental and compliance area of council receives about 3,500 complaints a year. Only a very small percentage of those complaints relate to holiday letting. Personally I deal with most of the holiday letting complaints and there would only be about four or five problem holiday lets a year. By "problem holiday lets" I mean holiday lets about which we get a second, third or fourth complaint or holiday lets on which we are unable to obtain a change in behaviour. The overall number of problem holiday lets is quite low. Mr MARK COURE: What was the nature of those complaints? What type of complaints were they? Mr HILL: The majority of complaints are about noise and disturbance. A small minority of complaints also include car parking and waste management. The

statement above supports that industry's attempts to manage the noise complaints over time have indeed been successful. The NSW Government's Code of Conduct will also assist this by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. For the reasons outlined above, we ask that Council rescind its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Councils meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Governments recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Colin Hussey Chief Executive Officer A Perfect Stay

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**Q6. Additional feedback**

As above

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**Respondent No:** 33

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 14:52:58 pm

**Last Seen:** Nov 27, 2020 14:52:58 pm

**IP Address:** n/a

Q1. **Name** Antony Palamara

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is a part time holiday rental of our premises and we have been operating in Byron Shire for almost 3 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.



The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Holiday letting a three bedroom house
- Utilising local Byron Shire businesses to assist us with our service. These include services of an agent, cleaners, gardeners, rubbish removalists, gas suppliers, plumbers and handypersons
- We have only had one noise complaint in the nearly three years of holiday rental

Servicing the STRA industry accounts for 60% of our business revenue and we employ 4 staff (agent, cleaners, rubbish removalist and gardener), the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 100% and we had all 4 staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 2 staff will lose their jobs
2. 2 staff may have to move out of Byron Shire, relocating their families etc.
3. Our business will lose 35% of revenue and be forced to downsize and close.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Antony Palamara Owner

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Q6. **Additional feedback**

As above

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**Respondent No:** 34

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 15:02:29 pm

**Last Seen:** Nov 27, 2020 15:02:29 pm

**IP Address:** n/a

Q1. **Name** Kylie-Anne Waugh

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business Sanctuary Services – property management. We have been operating and living in Byron Shire for 5 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following: • Manage Short Term Rental Accommodation Properties • Managing bookings • Cleaning • Linen services • Managing guest issues. N.B. we find that only 1 in 100 bookings receive noise complaints and we engage a local service to address issues immediately. The Holiday Letting Organisation and Quiet Hotline. Servicing the STRA industry accounts for 100% of our business revenue and we employ 6 staff and a contractor, the majority being local residents and working student visa holders. During the CoVID travel restrictions, business revenue dropped by 100% and we had 2 staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. 4 staff will lose their jobs 2. These 4 staff may have to move out of Byron Shire, relocating their families, study etc. 3. Our business will lose 70% of revenue and be forced to downsize and close as it would no longer be viable. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Kylie-Anne Waugh Proprietor, Sanctuary Services

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Q6. **Additional feedback**

As above

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**Respondent No:** 35

**Login:** Anonymous

**Email:** n/a

**Responded At:** Nov 27, 2020 15:13:50 pm

**Last Seen:** Nov 27, 2020 15:13:50 pm

**IP Address:** n/a

Q1. **Name** Kylie-Anne Waugh

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business Byron Adventure Vans – vehicle hire. We have been operating and living in Byron Shire for 5 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 – Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA

support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following: • Renting camper vans • Renting cars and people movers • Renting mopeds Servicing the STRA industry accounts for 30% of our business revenue and we employ 2 staff and many other local business services. During the CoVID travel restrictions, business revenue dropped by 100% and we had 2 staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. We would have to close the car and moped hire side of our business as it would not be viable. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Kylie-Anne Waugh Proprietor, Byron Adventure Vans

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**Q6. Additional feedback**

As above

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**Respondent No:** 36

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 01, 2020 10:08:23 am

**Last Seen:** Dec 01, 2020 10:08:23 am

**IP Address:** n/a

Q1. **Name** Brian Walshe

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Ribbish2move and we have been operating and living in Byron Shire for 12 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA



support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Rubbish removal
- Wheelie bin emptying and washing

Servicing the STRA industry accounts for 99% of our business revenue and we employ 8 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 60% and we had 6 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase in high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Brian Walshe Rubbish2move - Owner

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**Q6. Additional feedback**

As above

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**Respondent No:** 37

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 01, 2020 10:18:51 am

**Last Seen:** Dec 01, 2020 10:18:51 am

**IP Address:** n/a

Q1. **Name** Nick Rojo

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is North East Pool Professionals and we have been operating and living in Byron Shire for 18 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA

support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Check in services such as:
  - o Pool and spa water testing
  - o Pool and spa cleaning
  - o Pool and spa service and maintenance

Servicing the STRA industry accounts for 50% of our business revenue and we employ 7 staff, all of which are local residents. During the CoVID travel restrictions, business revenue dropped by 50% and we had 2 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 2 staff will lose their jobs
2. Our business will lose 40% of revenue and be forced to significantly downsize and even close.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Nick Rojo The Pool Professionals

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**Q6. Additional feedback**

As above

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**Respondent No:** 38

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 01, 2020 10:38:42 am

**Last Seen:** Dec 01, 2020 10:38:42 am

**IP Address:** n/a

Q1. **Name** Nicola Christoffersen

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Platinum Cleaning Byron Bay and we have been operating and living in Byron Shire for 4 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA

support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Cleaning and housekeeping for holiday houses

Servicing the STRA industry accounts for 100% of our business revenue and we have 20 subcontractors who live locally and rely on this work. During the CoVID travel restrictions, business revenue dropped by 95% and I was on jobkeeper payments for 6 months. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. I will not be able to supply ongoing work to the many subcontractors
2. My business will suffer a great loss of earnings
3. I may well lose my entire business that I have built up in the last 4 years.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase in high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Nicola Christoffersen Platinum Cleaning Byron Bay

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**Q6. Additional feedback**

Yes as above

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**Respondent No:** 39

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 02, 2020 10:02:34 am

**Last Seen:** Dec 02, 2020 10:02:34 am

**IP Address:** n/a

Q1. **Name** Jeremy Bennett

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Byron Bay Luxury Homes and we have been operating and living in Byron Shire for over 12 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA



support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Hands on management of holiday properties in Byron Bay
- We have been in this industry in Byron Bay for over 12 years and haven't had a complaint from Council or the Police Servicing the STRA industry accounts for 30% of our business revenue and we employ 5 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 90% and we had 2 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact that our business and the local tourism industry experienced during CoVID, however we also expect these impacts will be longer lasting and potentially devastating to our business and our employees. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 2 staff will lose their jobs
2. 5 of our staff may have to move out of Byron Shire, relocating their families etc.
3. Our business will lose 30% of revenue and be forced to downsize or close and the flow on effects to the wider community will make other businesses close and move out of the Byron Shire.

Do you honestly think limiting tourists won't limit Byron Bay commerce? We are a tourist town based on tourism, which equals commerce. It is that simple. I feel for the families out there about to have their incomes slashed. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Jeremy Bennett Byron Bay Luxury Homes

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Q6. **Additional feedback**

As above

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**Respondent No:** 40

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 02, 2020 10:41:28 am

**Last Seen:** Dec 02, 2020 10:41:28 am

**IP Address:** n/a

Q1. **Name** Destination Byron (Byron's local tourism organisation)

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

The need to take stock of our shire's visitor economy by way of extensive community engagement was necessary. Congratulations on a wonderful engagement strategy. We feel the engagement process was adequate to gauge community sentiment. We strongly believe a 10-year strategy is needed for the visitor economy and fully support the SVS being this mechanism.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

The forecast in the "Tourism Resilience Paper" is redundant. Byron shire is likely to experience record revenues between September and April 2021. As a destination, Byron Bay has likely experienced higher occupancy than all other domestic destination. As long as international borders remain closed or constrained, it is likely that our shire will experience elevated demand. In the absence of any federal or state government restrictions that restrict leisure travel to regional NSW, we anticipate this elevated demand to continue unabated through to April 2022. Theme 1: Leadership and Destination Management DB believes that there is a significant funding gap in what's would be needed to deliver the SVS and what's likely available locally. Historically, BSC has allocated little to no resource to 'destination marketing or messaging'. Achieving strategy 1: "Position Byron Shire as a leading sustainable and environmentally responsible tourism destination" would likely cost \$500k++ to achieve a measurable outcome. We also believe that successfully delivering this 10-year SVS strategy would cost close to \$1M in total. Almost every other local tourism organisation (LTO) in Australia receives government funding in some form and operate off budgets starting from \$500k p.a. Some examples of annual operating budgets are: - Tweed Shire \$950k. Noosa \$2-3M. Gold Coast \$18M. Sunshine Coast \$4.5M. Regretfully Destination Byron receives no funding, so there has never been, or won't be any destination messaging opportunities in the coming decade unless sizeable grants are received. Please note grants that are 'dollar for dollar' won't be successful as our visitor economy is made up of many tiny operators - so there's no coalition of businesses with scale that have budgets to contribute to this style of collaborative marketing. Strategy 2. "Investigate alternate methods to secure additional revenue streams from government and visitors to support the implementation of the SVS" – DB believes that BSC has historically misunderstood the composition of the visitor economy and interplay between overnight visitors and day visitors. DB believes that no voluntary visitor contribution will ever be adopted by visitor economy participants based on the lack of support recently. DB also believes any tax/levy on overnight visitors would need to apply to all overnight visitors equally (both authorised and STRA lodging), and that the 'day visitor market' needs to be considered due to its high impact, low yield contribution to our shire. Theme 2: Repositioning Byron Shire DB believes the "'Don't Spoil Us, We'll Spoil You' brand created in 2012" is redundant and doesn't speak to the destination. We believe it would be a very difficult task to articulate a brand and gain broad scale business adoption. All efforts to date have been contrived / synthetic and far too generic. Strategy 1. "Create a communications and repositioning strategy to attract visitors with shared community values" – this would likely require significant funding sans dollar for dollar matching. Theme 3: Culture DB believes this is a worthy Theme and looks forward to supporting BSC with the below two strategies: - Strategy 1. "Protect and enhance the indigenous, heritage, artistic and cultural diversity of Byron Shire". And Strategy 2. "Preserve the living culture and traditions of Byron Shire." Theme 4: Events DB believes this is a worthy Theme and looks forward to supporting BSC on the below strategy: - Strategy 1. "Improve the sustainability, coordination and management of festivals, business and leisure events, weddings and filming in Byron Shire." DB wishes to caution BSC on its approach to events, as many are 'high impact - moderate to

low yield'. E.g. Bluesfest being held over the busiest weekend of the year. Any events that welcome demand during lower demand periods is welcome. Theme 5: Transport, Infrastructure and Open Spaces The top three issues raised during the engagement stage of this strategy were 1. Traffic congestion, 2. road conditions and 3. parking. Strategy 1. "Improve road infrastructure, parking availability, open spaces and improve accessibility and safety." DB believes that there has been a very large missed opportunity over the past decade for BSC to improve infrastructure and open spaces. We believe efforts in this area would mitigate part of the above three issues and literally change the way people interface with the destination. DB believes the proliferation of the day-visitor market (mostly SE Qld) and STRA's (doubling/tripling the supply of beds in our shire) have contributed to the stress on our roads and infrastructure. (Current approved supply is circa 1,500 rooms, with STRA anywhere between 2,500-6,000 – pending source). DB believes the recent \$20M state infrastructure contribution has gone a long way to improving road conditions throughout the shire. It is very unfortunate that there is not a world-class bike path network (with subsequent electric bike rental) throughout the shire for residents and visitors, which would entirely satisfy Strategy 2. "Reduce visitor dependency on cars when visiting Byron Shire." Theme 6: Planning For Visitor Accommodation The largest threat to a sustainable visitor economy is the current supply and continued proliferation of Short-term rental Accommodation in the shire. Historically, BSC has been unsuccessful at forecasting the size and impact of this. The content of Theme 6 in the SVS goes no way in solving the issue or addressing roadblocks or hurdles. We do not believe capping rentals to 90 days occupancy will be governable or a deterrent to property investors as the nightly rate chargeable for a 90-day holiday let is equal or greater than a permanent resident. We believe any outcome of Theme 6 strategies or actions will at best mitigate further growth in STRA supply, but will not impact the existing supply (said to be anywhere between 2,500-6,000 rooms). The second sentence of the SVS executive summary states: - "Over the next decade, visitor numbers are forecast to grow by between 50-75%. In 2030, Byron Shire can expect 3.86 M visitors and 8.5M visitor nights (55% growth) if trends continue." There are actually fewer accredited beds in Byron Bay than 10 years ago, and all growth over the past decade has come from STRA. Projected growth will need to come from further STRA supply, as accredited supply growth can only be 20% at best based on likely sites without a DA, or DA applications be processed or recently approved. Current approved supply is circa 1,500 rooms, with STRA anywhere between 2,500-6,000 – pending source). The SVS projects stronger growth in the next 10 years than experienced in the last 10 years (exponential) in both visitor nights and day trippers. The projected growth cannot fit into the existing infrastructure (visitor economy probably out-grew the infrastructure a few years ago) - which isn't addressed. With so many extra visitors through 2030, BSC would need to plan for 16 new Elements of Byron sized resorts or 2,000 additional holiday houses to cover the required 2.4m room nights. This would place extreme pressure on residents and the base of local workforce. This would also require 1 or 2 new exits off the highway, and enough carparking space for an additional 789,000 day-trippers. Should these projections be true, DB regretfully does not see how BSC can manage the growth and associated community angst - let alone embark on becoming model destination managers... without a ton of resources being dedicated to it.

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**Q6. Additional feedback**

To whom it concerns, Thank you for accepting this submission pertaining to the Sustainable Visitation Strategy 2020 to 2030 as currently on public exhibition. Destination Byron (DB) is run by a group of ten volunteer board members (no remuneration). DB is not funded by any level of government, as many other local tourism organisations (LTO's) are. The committee is governed by its very own constitution. There are approx. 630 members at the moment. Membership is currently complimentary thanks to local business sponsors whom offset DB's operating costs. DB's tagline is 'Sustainable and Responsible Tourism'. Our vision is "To maintain a forum to educate and instigate positive change on all matters Byron visitor economy related." The three (3) major threats to a sustainable visitor economy as we see it are: - 1. Proliferation of Short-term rental Accommodation 2. Day visitors (very high impact, very low yield) 3. Van packers (non-paying overnight visitors) We remain enthusiastic about the SVS and are optimistic that it will serve as a roadmap to a more sustainable and responsible visitor economy. Kind regards, David Jones Vice-President DESTINATION BYRON (on behalf of the DB board)

██████████



**Respondent No:** 41

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 02, 2020 11:32:38 am

**Last Seen:** Dec 02, 2020 11:32:38 am

**IP Address:** n/a

Q1. **Name** Rick Slater for byronbay.com PTY LTD

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Yes - I believe a 10 year plan is essential. There has been so much growth and change in the 23 years I've been in business, the more Council can participate the better. As I understand it, the SVS is built around community feedback. It highlights many principles and themes - and anticipates continued strong growth in visitor numbers... With traffic and residential accommodation at their physical limits - it doesn't provide detail on the solutions. For example; The SVS points out that visitor nights in Byron Shire grew by 2.4m in the 10 years to 2019. And, over 100% of these extra room nights were accommodated in short term holiday rentals. The SVS anticipates room nights growing by 3m in the next 10 years - where will they stay? Similar detail around day visitors. Day tripper numbers grew 400k to 991k in the past 10 years - SVS anticipates they will grow by another 789k in the next 10 years. How many extra cars will be in Byron, where will they park, etc.?

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

I think COVID has perhaps helped Byron diversify from tourism with digital nomads, an increase in online shopping and even the desirability of Byron as a film location. I also believe that these same things will strengthen Byron as a 'must visit' destination.

Q6. **Additional feedback**

I am excited to see Council engaged with community and industry to explore the bigger picture. I feel the principles and themes will provide a road map when Council will have to focus on the ramifications of Byron's continued growth in visitor numbers. I am aware that most tourism destinations have been investing in their destination for decades - I hope Council is able to access the resources that will be required to manage Byron in the coming decade.



**Respondent No:** 42

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 08, 2020 10:56:11 am

**Last Seen:** Dec 08, 2020 10:56:11 am

**IP Address:** n/a

Q1. **Name** Jenny Smith

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Byron Bay Upholstery, Curtains and Soft Furnishings and we have been operating and living in Byron Shire for 19 years. We are writing in response to the Byron Shire Council's Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business's) peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following:

- Repairing items that are worn or damaged
- Making outdoor furniture covers
- Making curtains
- Making soft furnishings

Servicing the STRA industry accounts for 90% of our business revenue. During the CoVID travel restrictions, business revenue dropped by 100% and we had one of our staff on JobKeeper. We expect Council's proposed Planning Proposal will have a similar impact on our business and the tourism industry as experienced during CoVID, however these impacts will be longer lasting and potentially devastating to our business. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. Our business will lose 90% of revenue and will be forced to downsize or close. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Jennifer Smith Sole Trader Byron Bay Upholstery, Curtains and Soft Furnishings.

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**Q6. Additional feedback**

As above

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**Respondent No:** 43

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 08, 2020 11:11:33 am

**Last Seen:** Dec 08, 2020 11:11:33 am

**IP Address:** n/a

Q1. **Name** Jamie Gluyas

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is JSG Solutions and we provide emergency electrical 24/7 maintenance primarily for the holiday rental real estate market. We have been operating for 8 years and living in Byron Shire for 39 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on



average per trip, whereas the domestic day visitors spend \$102 on average. The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. We service the STRA industry by delivering the following: • Breakdown electrical repairs • Appliance repairs • Data and TV cabling • Hiring appliances and goods Servicing the STRA industry accounts for 80% of our business revenue and we employ 4 staff – all local residents. During the CoVID travel restrictions, business revenue dropped by 40% and we had 2 staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact on our business and the tourism industry as experienced during CoVID, however these impacts will be longer lasting and potentially devastating to our business. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. 2 of our staff will lose their jobs 2. Our business will lose 40% of revenue and will be forced to downsize. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase in high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Jamie Gluyas Manager – technician and long-term local business owner.

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**Q6. Additional feedback**

As above.

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**Respondent No:** 44

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 09, 2020 15:52:50 pm

**Last Seen:** Dec 09, 2020 15:52:50 pm

**IP Address:** n/a

Q1. **Name** Jo Wieden

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Business owner/operator  
Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

We need holiday letting to be available 365 days a year. This affects the livelihood of many people in the area. My house being holiday let pays wages to cleaners, gardeners, real estates and a vast array or tradespeople on a regular basis. Not to mention the high land tax and rates I pay. My work has been affected by COVID dramatically as has many peoples, and without this rental income I would struggle to pay the bills. I think it is atrocious to put so many people in further financial distress. Many people want to holiday here and there are not enough accommodations available. If council wants to improve the liveability of the holiday areas of the Byron shire, they would be better to direct their attentions to illegal van campers and dune dwellers who are adding nothing but drugs and mess to our communities rather than to bite the hands that are feeding them.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

As above

Q6. **Additional feedback**

As above





**Respondent No:** 45

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 09, 2020 16:32:48 pm

**Last Seen:** Dec 09, 2020 16:32:48 pm

**IP Address:** n/a

Q1. **Name** Alison Stawell

Q2. **Email**



Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

New Brighton should not be lumped in with Ocean Shores. New Brighton is "holidays" especially the strip between the river and the sea!

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Obviously, there is currently a huge demand for domestic holiday letting due to Covid preventing overseas travel. This must be good for the local economy.

Q6. **Additional feedback**

Please take a look at New Brighton as being available for longer holiday lets.



**Respondent No:** 46

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 09, 2020 17:45:23 pm

**Last Seen:** Dec 09, 2020 17:45:23 pm

**IP Address:** n/a

Q1. **Name** Roger Uren

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

The fundamental change proposed is towards hosted holidays and against what I offer. What I offer is exactly what the renters want. They are free to enjoy my place as their "home" for a week or two. They do not want me here hosting them. This village has been a favourite beach holiday destination for 100 years. The majority of houses on the beach here are holiday homes. We do not service the folk who want a "Byron Bay" holiday. This is a quite village that stresses tranquility as its draw. Walks on the beach, surfing, reading, fishing etc. There are no part types here and I do not rent for weekends to avoid that traffic. I think your solution specifically for New Brighton is simply wrong.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

See my comments in 4.

Q6. **Additional feedback**

Finally a practical point about New Brighton. Homes such as mine located right on the beach are the heart of New Brighton and are a lovely spot for visitors to stay. The downside for anyone who owns such a house is the very high maintenance costs that one faces due to the salt air the corrodes everything metallic even stainless steel unless it is marine grade. This means appliances such as TVs, BBQs, air-conditioning motors etc rust out and need replacing every 3 or 4 years. Land tax is also very high and sadly has forced many owners of holiday homes here to sell as a typical dairy farmer from Kyogle can no longer afford to pay such high land taxes for a second dwelling. Without some income to mitigate the cost of keeping one of these homes there could be a general fall in the standard of the occupation provided which will be to the detriment of the enjoyment enjoyed by any holiday maker who visits. New Brighton is NOT Ocean Shores or Byron Bay but is a special place that attracts the quiet family visitor. I have a core of renters who have been coming back every year since I purchased this home in 2001. Maybe you should ask them why they want to come and rent my home for a holiday!



**Respondent No:** 47

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 09, 2020 19:38:01 pm

**Last Seen:** Dec 09, 2020 19:38:01 pm

**IP Address:** n/a

Q1. **Name** Luke Schultz

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is Lighthouse Linen, we hire linen to holiday let properties and we have been operating and living in Byron Shire for 2 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff. - Providing linen hire for holiday let properties Servicing the STRA industry accounts for 60-80% of our business revenue and we employ 2 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 95% and we had 2 of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact on our business and the tourism industry as experienced during CoVID, however these impacts will be longer lasting and potentially devastating to our business. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result: 1. 2 of our staff will lose their jobs 2. Our business will lose 60-80% of revenue and may be forced to downsize or close. The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Councils meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Governments recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase to high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Luke Schultz Owner / Operator Lighthouse Linen

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**Q6. Additional feedback**

As above

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**Respondent No:** 48

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 09, 2020 20:27:43 pm

**Last Seen:** Dec 09, 2020 20:27:43 pm

**IP Address:** n/a

Q1. **Name** Catherine Shaw

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Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No! I fully support the aims of sustainability, however, considering the very difficult past year, it is shortsighted to deny smaller townships the opportunity for greater occupancy. It is not just the large towns that need a good flow of tourist dollars to survive.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Amend the reduced occupancy days for smaller towns etc so that their businesses can achieve a good income

Q6. **Additional feedback**

I do endorse the vision and themes



**Respondent No:** 49

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 10, 2020 08:49:22 am

**Last Seen:** Dec 10, 2020 08:49:22 am

**IP Address:** n/a

Q1. **Name** Susan Verga

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

If you limit the holiday rental as proposed this is not going to help people finding a holiday rental just make it worse, Byron rent escalate and be affordable as the holiday rental supply will be limited to these proposed areas. this is the wrong approach.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

I object for the requested for parts of Byron Bay, Suffolk Park and the CBD area of Brunswick Heads (from Tweed St to the ocean) to be available for holiday let for 365 days per year. All other areas including from the other side of Tweed St inland towards the highway, Ocean Shores, South Golden Beach & New Brighton are to be let for only 90 days per year. As a owner holiday house at Ocean Shores this will huge impact our financial status as the property is under mortgage and we have a huge land tax, if the rent is reduce to 90 days of the year this will not help us sustain our financial obligations and could put us in a position to default on our loan payments and loose our holiday home, which our family enjoys very much. During this pandemic that is not over, as Victorians and have been financial affected and for the Byron Shire Council is determined to have holiday letting reduced from 365 days per year to 90 days is poor act during these time especially when no Australians can travel over seas.

Q6. **Additional feedback**

Covid 19 could be here for years to come, so Australians traveling within Australia its important to keep up with the supply and demand for rental properties not to limit this as proposed areas like Byron bay. We need to Keep these holiday properties in Ocean Shores, South Golden Beach & New Brighton available for all Australians to enjoy for 365 days per year.



**Respondent No:** 50

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 10, 2020 09:46:47 am

**Last Seen:** Dec 10, 2020 09:46:47 am

**IP Address:** n/a

Q1. **Name** Kevin & Susan Bowe

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

After reviewing your draft proposal, we wish to make the following Submission. 1 We believe that the original problem regarding short term holiday rentals was residents of Byron Bay renting their homes for very high rates in peak holiday times. In addressing this problem the Council has now lost sight of this and has instead discovered a way of increasing income. 2 New Brighton, has always been a destination for families wishing to avoid the high priced tourist beach areas such as the Gold Coast and Byron Bay. 3 These families do not cause problems in the area but add to it financially by spending in the local stores and markets, as well as contributing to the income of the service industries, such as agents, cleaners, restaurants and tradespeople. In the past we have rented the house to semi permanent tenants, but the damage to the property and the way it was treated (including a dog whelping on one of the beds) made us switch to short term holiday rentals. We have had only incidental wear and tear to the house since. We have also had fewer complaints from neighbours! Should this proposal go ahead we would have to consider leaving the house empty when we or our friends are not using it. This would be to the detriment of the local stores and services mentioned earlier. It would also mean the possibility of more damage to the property and others in the same situation, with undesirable types knowing they were vacant and unsupervised for longer periods. New Brighton is not Byron Bay. The rental situation has been benefitting both the locals and the owners for a long time and there is no need to alter it.

Q6. **Additional feedback**

As above



**Respondent No:** 51

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 10, 2020 13:41:01 pm

**Last Seen:** Dec 10, 2020 13:41:01 pm

**IP Address:** n/a

Q1. **Name** Ben Armstrong

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you**

- Visitor
- Business owner/operator
- Other (please specify)

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No. The Tourism Resilience Paper outlines the importance of tourism to many aspects of the local community and how COVID has negatively effected tourism and therefore negatively impacted the Byron community. The SVS then draws a long bow to conclude with strategies and actions to regulate and therefore limit the amount of STRA available in Byron and sees this as a solution without identifying the whole impact this will have on tourism. I do not see this as a complete solution to improve sustainable tourism and the community. In fact I see this regulation of STRA will have detrimental effects on tourism and therefore the community.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Yes. All strategies and actions are irrelevant to a document that is extremely vague on it's purpose. Is it for "a roadmap for an adaptive and resilient tourism sector"? Or is it to maximise local economic benefits, maintain a sense of culture, and maximise benefits to the environment? Either way, the strategies and actions in the SVS do not address any of these.

Q6. **Additional feedback**

The statistics provided in these documents suggests that 58% of beds for tourism accommodation private homestay, holiday apartments, and holiday houses. It is these beds that Byron Council are trying to regulate through zoning laws to significantly limit the amount of this accommodation. These changes will have a detrimental impact on the affordability of tourism in Byron and therefore the number of tourists who visit Byron each year. This in turn has a detrimental impact on the local economy and community. Tourism will always be a cyclical industry with ebbs and flows around events and school holidays. It is this 58% of accommodation that takes up the demand for beds during these peak tourism times and therefore make the events and holidays a success. DO NOT RESTRICT A PRIVATE PROPERTY OWNER FROM RENTING THEIR PREMISES FOR EITHER LONG TERM OR SHORT TERM OCCUPANTS





**Respondent No:** 52

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 10, 2020 21:45:14 pm

**Last Seen:** Dec 10, 2020 21:45:14 pm

**IP Address:** n/a

Q1. **Name** Maria Nugent

Q2. **Email**



Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

There should be no limit to the non hosted accommodation letting. This is a source of income for a lot of people and there should be other ways to address issues rather than penalising people. Eg council could fine nuisance offenders directly ie clients not the hosts- this would be fair and change behaviour accordingly

Q6. **Additional feedback**

Attracting a wide range of visitors to Byron comes from improving the attractions available. Opening up the Rail trail between Byron and Bangalow as a start would encourage families and bush walkers/cyclists etc of all ages who are interested in nature and exercise more than partying. And spread the tourist loads. Improving roads and access by adding a new road next to the rail line from Mullumbimby and removing parking in Shirley St asap to add extra lanes in and out of town especially at Peak times, Free parking and shuttle bus and bikes to encourage people to leave cars at sports fields, Tree lined shaded foot and cycle paths, etc Being realistic about growth to the area with an aging population and starting infrastructure now with Federal and State support. It's selfish to try and exclude people and say area is only for us. Look at American towns like Santa Barbara[7.2 million annual visitors] and Carmel[8 million] which have stayed authentic. Need to set up a vision of sustainability and have visitors on board too.



**Respondent No:** 53

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 11, 2020 08:23:43 am

**Last Seen:** Dec 11, 2020 08:23:43 am

**IP Address:** n/a

Q1. **Name** Kris Ikstrums

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Business owner/operator  
Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal (365 day precincts and the Byron Shire Sustainable Visitation Strategy 2020 - 2030) To whom it may concern, Our business is "Cleans Means Heinz" window cleaning and pressure washing and we have been operating and living in Byron Shire for 28 years. We are writing in response to the Byron Shire Councils Planning Proposal for Short Term Rental Accommodation in Byron Shire and Theme 6 of the Byron Shire Sustainable Visitation Strategy (SVS) – Planning for Visitor Accommodation, in particular we are flagging our concerns with the following strategies and actions: 1. Strategy 1 – Improve the regulation of short term rental accommodation 2. Strategy 2 - Improve planning regulations and zoning for managing the growth of tourism 3. Action 1 – Prepare a planning proposal to define and regulate short-term rental accommodation. The planning proposal should include limitations on the maximum number of days a dwelling can be used for non-hosted short term rental accommodation in a calendar year 4. Action 3 – Investigate the introduction of planning controls to support a diversity of accommodation type to suit various visitor types, with enough accommodation in different localities to encourage visitor dispersal and to minimise impacts on our communities and our natural environment 5. Action 4 – Regularly monitor tourism trends and evaluate planning controls to ensure the visitor economy and community are considered. We understand that on 15 February 2019, A Ministerial Planning Direction was issued that allowed Byron Shire Council (Council) to prepare a Planning Proposal to reduce Short-Term Rental Accommodation (STRA) in Byron Shire for non-hosted accommodation to be no less than 90 days. Council's industry and community engagement regarding the Planning Proposal was undertaken during December 2019 and January 2020, which is the tourism industry's (and our business') peak period. The timing of Council's engagement made it difficult for the tourism industry to contribute to the discussion, and as a result, the consultation process was seen as disingenuous by our business and we would like the opportunity to provide formal feedback. According to economy.iD, Tourism is the largest industry sector and employer in the Byron Shire. In 2019, total visitation to Byron Shire was 2.41 million visitors, who stayed 5.42 million visitor nights and contributed \$883 million to the local economy creating 4,396 jobs. In 2019, 47% of visitor nights to Byron Shire were in hosted and non-hosted STRA (2,538,000 visitor nights). In theme 2 of the SVS – 'Repositioning Byron Shire'. A key strategy outlined in the document is to reposition the Byron Shire through changing the visitor mix, managing visitor behaviour and attracting visitors who respect the community and environment, who stay longer, who are low impact, and who want to explore various towns and villages within the Shire (visitors that align with community values). According to the major property management organisations in Byron Shire, approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact and high yielding with many dispersing to the Shire's towns and villages. Visitors who stay in STRA support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within the Byron Shire. According to Tourism Research Australia, in 2019, domestic overnight expenditure accounted for \$644 million, or 75%, of total visitor expenditure to Byron. Domestic overnight visitors spend \$732 on average per trip, whereas the domestic day visitors spend \$102 on average.

The visitors that stay in non-hosted STRA support the Byron Shire economy and account for a large portion of the visitor spend which supports local jobs and the diverse retail/food/restaurant mix that the local community can enjoy. Below we have outlined some of the economic and social impacts the proposed Planning Proposal will have on our business and staff:

- Window cleaning domestic and commercial
- Pressure washing domestic and commercial
- General property maintenance
- Solar panel washing

Servicing the STRA industry accounts for 50% of our business revenue and we employ 4 staff, the majority being local residents. During the CoVID travel restrictions, business revenue dropped by 30 - 50% and we had all of our staff on the JobKeeper payment. We expect Council's proposed Planning Proposal will have a similar impact on our business and the tourism industry as experienced during CoVID, however these impacts will be longer lasting and potentially devastating to our business. If the 90 day STRA planning proposal is approved (together with the 365 day precincts outlined at Byron Shire Council's meeting on 19/11/20), we expect the following impacts will result:

1. 2 of our staff could lose their jobs
2. 1 of our staff may have to move out of Byron Shire, relocating their families etc.
3. Our business will lose 50% of revenue and be forced to downsize.

The Byron Shire economy, residents and community thrive on tourism. We are committed to providing the best customer experience and level of service for our share of the 47% of domestic overnight visitors to Byron Shire whose preference is to stay in STRA. We would like to see the tourism industry in Byron continue to thrive sustainably and be managed responsibly. We are in full support of the NSW and Federal Government's plans to boost Australia's economic recovery through a focus on domestic travel campaigns. However, limiting accommodation capacity to one of Australia's most popular regional tourist destinations is going to severely impact the local and regional economy, jobs and many of the community's livelihoods. We are also in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. We believe this framework, coupled with the NSW Code of Conduct, will be a significant step towards regulating the industry and will work with the existing Byron Holiday Letting Organisation to manage some of the anti-social behaviour and noise complaints. We would like to see these new frameworks in place for an agreed period of time prior to Council having the opportunity to significantly impact the local economy further with its Planning Proposal. We don't believe that limiting non-hosted rental accommodation will assist in managing the issues outlined in Council's Planning Proposal. Housing affordability and the housing shortage referenced will not be solved through limiting non-hosted STRA to 90 days, or 365 days in some precincts. With regard to managing noise complaints we believe that the Code of Conduct complements the existing management we have in place through the Byron Holiday Letting Organisation (HLO), which commenced back in 2005. The NSW Government's Code of Conduct will also assist by excluding the small percentage of STRA properties who are repeat noise offenders. We believe the Code of Conduct will assist with further regulating industry and minimising noise complaints. Reducing STRA in Byron Shire to 90 or 180 days will not act as an effective measure as landlords will seek higher prices during peak periods and properties will remain vacant for the remaining period, which does not increase the residential housing stock. Instead this will significantly impact the tourism industry, the economy and many of our residents whose livelihood depends on it. We ask Council to give the State Government STRA framework and measures an opportunity to have an impact in Byron Shire. For the reasons outlined above, we ask that Council rethink its proposal of a 90-day STRA reduction in Byron Shire (and the 365-day precinct plans endorsed at Council's meeting on 19/11/20). We request that a 365-day blanket approval for STRA is sustained across the whole of Byron Shire (as per the State Government's recommendation for regional NSW) to ensure our business can thrive in a post CoVID environment, recoup some of the income lost in 2020 and continue to employ local residents in our business and ensure we are able to reside in the Shire. In closing, Council's planning proposal will have severe repercussions at a local and regional level as Byron Shire is a major dispersal destination for many towns and villages on the Far North Coast. Any attempts to decrease accommodation capacity will give rise to an increase in high-impact day visitors and decrease the high-yielding and low-impact family market that travels to Byron Shire to stay in STRA. Many businesses, including ours, will be unable to sustain a decrease in revenue caused by the 90-day reduction in STRA. The 365 day proposed precincts provided at Council's meeting on 19/11/20 also ensure that our business revenue is still severely impacted as many of the properties we manage are outside of these precincts. Thank you for considering this information. We implore Byron Shire Council to undertake its due diligence and provide an extensive report showing the social and economic impacts of the STRA Planning Proposal and the subsequent impacts on the SVS and wider tourism industry. Yours sincerely, Kris Ikstrums Company Director / Owner

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**Q6. Additional feedback**

As above

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**Respondent No:** 54

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 11, 2020 14:52:10 pm

**Last Seen:** Dec 11, 2020 14:52:10 pm

**IP Address:** n/a

Q1. **Name** Jenny Bannister

Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Our infrastructure can not handle so many visitors . -Water -Public toilets -Roads -Parking THINK ABOUT IT

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

No STHLS in bodycorp compounds with No on-site manager please! Visitors treat our private compound like a Resort !!  
We do not have an on-site manager or toilets by the pool !!

Q6. **Additional feedback**

STHL GUESTS in private compounds sharing our pool , carpark and garden are a health risk . No manager onsite No public toilet at the pool Noise , litter , alcohol , germs , Damage to furniture , pool and garden , Gates , carpark . All add up to excess costs for permanent residents Get rid of STHL in private compounds PLEASE



**Respondent No:** 55

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 11, 2020 15:29:35 pm

**Last Seen:** Dec 11, 2020 15:29:35 pm

**IP Address:** n/a

Q1. **Name** John Gudgeon

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Business owner/operator  
Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

As below

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Byron Shire Council's 90-day Short Term Rental Accommodation Planning Proposal and Sustainable Visitation Strategy I am making a request on behalf of the STRA sector in Byron Shire that the request by Byron Shire Council (BSC) to introduce caps below 365 days per annum and precincts be reconsidered. The Holiday Letting Organisation (HLO) Byron Inc (<http://hlobyron.com.au>) is a STRA owners organisation formed in 2005 when BSC was making a determined effort to eradicate the sector. I was elected President then and, because the situation has not really changed in Byron Shire, remain so today. Currently membership comprises approximately 500 professionally managed properties. In 2005, HLO created a Code of Practice (appended) designed to address behavioural management issues. This was a simple tool designed to create a minimum standard for STRA property management. Over the past 15 years, the HLO has taken a leadership role in the responsible management of STRA properties and guests through the introduction of its noisy neighbour hotline security response service, which responds to the small and isolated number of complaints made by the community regarding unacceptable behaviour in dwellings let for STRA purposes. The HLO would also like to reference an excerpt of the testimony that Andrew Hill, Compliance Officer at Byron Shire Council, made at the 2016 Short Term Holiday Letting State Government Legislative Inquiry. This excerpt was recorded on 7 March 2016 and is on the public record: Mr JAMIE PARKER: So how many complaints would you have in a year on those issues? I am not talking about the legality or illegality of short-term accommodation but people complaining about amenity impacts for short-term accommodation properties. Mr Hill: We probably only get of the order of 100 or 200. I do not have the statistics with me. We do have those statistics. Mr JAMIE PARKER: That is a ballpark figure. That is all right. Mr HILL: The environmental and compliance area of council receives about 3,500 complaints a year. Only a very small percentage of those complaints relate to holiday letting. Personally I deal with most of the holiday letting complaints and there would only be about four or five problem holiday lets a year. By "problem holiday lets" I mean holiday lets about which we get a second, third or fourth complaint or holiday lets on which we are unable to obtain a change in behaviour. The overall number of problem holiday lets is quite low. Mr MARK COURE: What was the nature of those complaints? What type of complaints were they? Mr HILL: The majority of complaints are about noise and disturbance. A small minority of complaints also include car parking and waste management. The statements above confirm the work of the HLO and industry's attempt to manage noise complaints in Byron Shire over time have indeed been successful. In 2012, I represented HLO Byron on the committee to write the Code of Conduct that was initiated by the NSW Government to encourage the STRA industry to become more effective at self-regulation. HLO Byron adopted that Code when it was released. HLO has always been in full support of the State Government's STRA Planning Framework, which in its current draft supports 365 days of non-hosted STRA in regional NSW. The HLO believes this framework, coupled with the NSW Code of Conduct will be a significant step towards regulating the industry and will complement the work HLO has been doing for the past 15 years. We would like to see these new frameworks in place for an agreed period of time prior to BSC Council having the opportunity to significantly impact the local economy with its Planning Proposal. Current Position of HLO Byron The simple fact is Byron Shire's economic existence is driven and supported by the visitor economy. Approximately 70% of visitors that stay in non-hosted STRA across Byron Shire are families and couples travelling without children (the other 30% comprise of larger family

groups, adults travelling with adult aged children and small groups of friends travelling together). These visitors are low impact, high yielding and disperse to many of the Shire's towns and villages. Visitors who stay in STRA also support the local economy by spending money in destination that supports local food producers, the arts and creative industries, nature-based tourism experiences, the retail industry, restaurants/cafes and many of the wellbeing businesses within Byron Shire. Some years ago, when I was on the board of the Byron Bay Chamber of Commerce, the second economic driver was welfare. This will always be the case where we have a council culture that opposes all development. The population still sits around 33,000 with some 16,000 rate payers. Byron Shire can never develop an internal economy with such small numbers. It is increasingly isolated compared with Ballina Shire to the south and Tweed to the north. Their population growth and accompanying infrastructure is the reality of the demand for this region. The BSC cites reasons such as lack of affordable housing and negative effects on community amenity as justification for this incessant crusade against STRA. Market forces are dictated by supply and demand. The policies of the BSC in opposing any significant growth in housing (particularly affordable housing) for the past few decades has meant that the enormous natural popularity of Byron Shire as a destination to live in or visit has far outstripped what is available. I have lived in Byron Shire since 1973, nearly a half century, and can confidently say that the sense of community and general satisfaction with amenity (except for the traffic) is very high. The growth in numbers at all the Shire's schools is a reliable metric as to the number of permanent locals increasing not decreasing. This is contrary to what the BSC would like everyone to believe. In closing I reiterate HLO Byron's request that Byron Shire Council reconsider imposing any caps or restrictions on STRA use of residential dwellings in any part of the shire. Thanking you for your attention to this, Yours faithfully, John Gudgeon President HLO Byron Inc.

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**Q6. Additional feedback**

As above

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**Respondent No:** 56

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 11, 2020 16:21:01 pm

**Last Seen:** Dec 11, 2020 16:21:01 pm

**IP Address:** n/a

Q1. **Name** Veda Turner

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Q2. **Email**

[REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire  
Business owner/operator

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Yes

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Unsure

Q6. **Additional feedback**

I think that on a brief perusal, the document is helpful. My concerns surround the impacts of Short Term Accom. I support the 90 day non-hosted limits, and the hosted 365 days I believe that the impacts of housing stock being removed from long-term stock certainly needs considering. Affordable Housing must be made a reality. Likewise I have concerns for the impacts STRA has on registered licensed hosts such as Motels and B&B's There needs to be a Traffic Strategy that restricts access of visitor vehicles to town. Park and Ride must be boosted and made attractive to visitors. The longer and longer vehicle ques are a disincentive to visitors and may well turn 'good' tourists away.



**Respondent No:** 57

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 11, 2020 17:04:21 pm

**Last Seen:** Dec 11, 2020 17:04:21 pm

**IP Address:** n/a

Q1. **Name** A Franzoni

Q2. **Email**



Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

In general terms yes . However it's not fair or appropriate to dictate how people earn money from their properties in the Shire. This is a very difficult Shire to survive in on a number of levels and Council don't have the right to discourage people from legally getting by. In addition, the focus should not just be on problem short term lets - it's absolutely right that all Shire residents (home owners, permanent letters, and short term letters) abide by a code of conduct which enshrines respect for their neighbours and the community. If this was the case then there would be no need to target any one group but encourage everyone to live happily here, even if they are simply visiting for a weekend. Anyone in our community who can't comply with this code should be directly held to account.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

Given projections for visitors and tourism income to fall significantly due to COVID, it's inappropriate to penalise residents who want to short term let as a means to survive. The proposed 3 month-only rule for non-hosted letting is unfair and will cripple many long-term Shire residents who won't be able to afford their own properties here or will be impacted by the fall in tourism numbers and jobs. The proposal lacks insight into the impacts of COVID and is also unrealistic about the way people in the Shire survive financially: unemployment levels in the Shire are already well over national averages and many residents who can't find permanent work now use their own homes as a source of income to cover the enormous costs of living here. For example, many Shire residents use short term letting as a way to pay their huge rate costs or mortgages. Loads of residents temporarily move out of their properties for extra income but they remain in the Shire either staying at camping grounds or moving in with relatives or friends. Why should they be limited to just 3 months of letting per year if this means they and their families can't survive here any longer and would be forced to sell up and go? Others who own property in the Shire may be long term investors but struggle to cover all the costs of owning property here (rates/land taxes etc) because these costs are pegged to land valuations. Thus because land values have been pushed up here so far - due to tight planning regulations and lack of supply - their costs have skyrocketed as a result and the only way to cover all these expenses is to holiday let rather than permanently let - even if they have employment, Australian wage growth is zero and regular letting doesn't keep pace with ownership costs which have risen stratospherically relative to inflation. Affordable housing and rentals are very important but if you don't strong employment growth, and recognise that holding costs for providing that housing are out of control, then you can't force people to do it by curtailing short term lets. Perhaps Council can partner with residents or investors and incentivise the provision of permanent lets in a way that makes it affordable for both sides?



**Q6. Additional feedback**

The rail trail should be a top priority for the Shire and could be made a world-leading attraction. Plus, freeing roads both into and OUT of town should be the primary focus. The town is absolutely constipated every day and it is an additional source of stress, not just for residents, but also ends up pushing tourists into the centre of town - rather than encouraging them to stay in town surrounds - because it's so unworkable to visit the shire and then spend 2-3 hours in traffic just to come and see Main Beach or the Lighthouse. If these traffic jam issues were solved, it would go a long way to spreading the tourism congestion and community load across all parts of the Shire. This could provide a wonderful boost to outlying villages within the Shire and broaden the employment prospects for many, while allowing the centre of town to be enjoyed more easily by everyone and more often. Given it's become so painful getting in and out on Ewingsdale Road, many people don't even bother to come or if they do, they refuse to stay anywhere but the town centre. Fix these traffic lines and a lot of other issues facing the community, including density of short term letting problems, will be improved too. At a minimum, the road out from the Police Station all the way to the Pacific Highway should be made 2 lanes. Having this problem also greatly negatively impacts non-tourism businesses and industries and if you want our town to be less dependent on the tourism dollar then you must supplant the income and jobs which come via tourism with alternative sources - again incentives, i.e. for businesses employing locals, as well as adequate road infrastructure and services are absolutely key.

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**Respondent No:** 58

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 12, 2020 10:10:05 am

**Last Seen:** Dec 12, 2020 10:10:05 am

**IP Address:** n/a

Q1. **Name** Scott Bedford

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

No I do not...Tourism in the shire is already bouncing back strongly and I do not believe that the projected figures you are estimating to be true. Unless I have misunderstood you are saying that projected figures (pre covid) for 2021 will now not be reached until 2030? Byron Bay over the past three months has become more crowded and the cbd almost gridlocked at parts of the day ever day.

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

I do not agree with your plans to limit STRA for non hosting to 90 days. People and property owners should be allowed to do with their properties as they wish. If they attract complaints from neighbourhood property owners these complaints can be handled easily through a tribunal of some sort that can deal with these issues. Maybe something like a (sin bin) type of thing. I find the more regulation a government enacts the more problems there are. Home owners, in the majority, are responsible people who want the best for themselves and their neighbours. Let them work these things out themselves.

Q6. **Additional feedback**

STRA for non hosting, I understand is a contentious issue. I personally do not own property in the shire and having made Byron Shire my home over the past 25 years I have many friends who have invested much time and money in building up their STRA businesses. They are doing very well, very responsibly, I might add and any complaints they have had have been dealt with swiftly and agreeably with their neighbours, without any ill will. STRA for non hosting works very well. Without it, or reducing it to 90 per annum days in certain areas is mindless and will decrease economic value in the shire by a huge amount as much less accommodation will be available for tourists. This is obvious. You are saying in one breath that tourism is smashed and will not recover for many years and in the next breath, proposing to take away what actually attracts and increases tourism in the shire. This seems to be contradictory. . Hotel rooms are now at an all time high occupancy rate and you propose to take away a much needed accommodation alternative. This is not only near sighted but an affront to good, responsible and entrepreneurial spirits who provide a wonderful service. I strongly object to your proposal for 90 days STRA per annum.



**Respondent No:** 60

**Login:** Anonymous

**Email:** n/a

**Responded At:** Dec 14, 2020 11:42:30 am

**Last Seen:** Dec 14, 2020 11:42:30 am

**IP Address:** n/a

Q1. **Name** Alan Heathcote

Q2. **Email** [REDACTED]

Q3. **Please choose the category which best suits you** Resident of Byron Shire

Q4. **Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?**

Yes

Q5. **Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?**

No

Q6. **Additional feedback**

We live at [REDACTED]. The precinct map for Suffolk Park shows permitted holiday let areas all along Alcorn St both east and west side of the road yet it stops to the immediate south of CT270196. It then recommences to the immediate north for SP90496 which is also a part of CT270196. With respect my submission requests that all of 2 Alcorn St CT270196 be marked up yellow to permit holiday letting. The reasons for this are several; 1) Some of the houses in the CT270196 have long been holiday let. 2) The "Tallow Beach Houses" SP90496 are tourist accommodation. 3) There is no material difference between 2 Alcorn St CT270196 and all other residential houses along Alcorn St. Please feel free to phone Alan Heathcote on [REDACTED] to discuss and thanks for considering my submission. Best Regards Alan Heathcote

Kind regards,

Sarah Nagel | Manager, Public & Environmental Services | BYRON SHIRE COUNCIL



Office days – Monday, Thursday, Friday

*I would like to acknowledge the Arakwal Bundjalung People and the wider Bundjalung Nation as traditional owners and custodians of this land and pay my respects to elders past and present.*

cid:image001.png@01D4242C.F8B269B0



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**From:** Morrison <[REDACTED]>  
**Sent:** Monday, 14 December 2020 7:00 PM  
**To:** council <[council@byron.nsw.gov.au](mailto:council@byron.nsw.gov.au)>  
**Subject:** Sustainable Vision Strategy - objection to proposal to limit short term leasing

Dear Byron Shire,

We would like to formally express our strong opposition to the proposed changes to holiday letting in Byron Shire limiting our ability to short term lease our area to only 90 days a year as part of the Sustainable Vision Strategy proposal.

We own a property at [REDACTED] South Golden Beach which we make available for holiday letting through North Coast Lifestyle Properties in Brunswick Heads. We are responsible owners and we ensure that tenants leasing our house do so responsibly, with due concern for our neighbours. We also use the property ourselves whenever we can as we too, love the area.

Our property was built as a holiday house and has been a short term rental property for at least 30 years. The proposal by the council to limit the days properties in the South Golden Beach area can short term rent to 90 days a year is unfair especially when other areas in the Shire are being proposed to be allowed to rent for the whole year. This will cause significant distortion in the Shire and will have negative impacts such as creating short term letting “ghettos”.

At present in South Golden Beach under the existing rules there is a good mix of long term and short term residents as the council should fully understand.

Importantly by providing a holiday rental in South Golden Beach we provide an important service to the area and give back to the local community. We ensure that we use local trades people and buy supplies and electrical goods from local business, as well as, encouraging those leasing our property to visit local cafes, attractions and businesses.

We do understand it is important that holiday letting is done through licensed real estate agents, as this provides important controls and an on-the-ground presence in the rare cases that problems occur. Ensuring holiday rentals are done through agents would be a more effective way to meet some of the Council's objectives. We would predict that if the proposed changes do come into effect they will likely force many owners to operate "underground".

We would like to formally express our strong opposition to the proposed changes to holiday letting in Byron Shire, as they are putting this important component of the Byron Shire economy at risk and are blatantly unfair to owners of properties in areas outside of designated short term leasing areas.

Best regards,

William and Nicola Morrison

[REDACTED]

South Golden Beach

[REDACTED]

# BYRON SHIRE SUSTAINABLE VISITATION STRATEGY

SUBMISSION 17 DECEMBER 2020 FROM:

**Brunswick Heads.** Chamber of Commerce.



**Brunswick Heads.** Tourism.



**Brunswick Heads.** Visitor Centre.



**Brunswick Heads.** Simple Pleasures.



## INTRODUCTION

The Brunswick Heads Chamber of Commerce Inc. is the peak body for businesses in Brunswick Heads and functions with the support of several subcommittees. Meetings with members of four of these subcommittees were held to review the Tourism Resilience Discussion Paper and the Byron Visitation Strategy. The final submission was approved by the Chamber Executive Committee. Thank you for the opportunity to contribute our feedback to the Byron Shire Sustainable Visitation Strategy 2018-2028.

The committees that contributed to this submission are:

1. Brunswick Tourism Group (has been operating continuously since 1999)
2. Simple Pleasures Design Team (has been operating continuously since 2005)
3. Brunswick Heads Visitor Centre (has been operating continuously since 2006)
4. Brunswick Heads Holiday Letting Subcommittee (has been operating continuously since 2003)

## BACKGROUND

### **Brunswick Heads Settlement Strategy**

The Brunswick Heads Village Committee was established in 1999 to follow on from a series of “Sense of Place” workshops to guide the village’s direction into the future. The Village Committee, which comprised representatives of the Brunswick Heads community, met regularly between 1999 and 2001 to contribute to a Brunswick Heads Settlement Strategy which was adopted by Council in 2004. Several subgroups were established during this process. One of these was the Business and Tourism Group. After the Settlement Strategy meetings concluded the group continued to meet. The first task of this group was to prepare a Tourism Management Strategy to protect the town.

### **Taking Care of Brunswick Tourism Management Plan**

The need for a blueprint to manage tourism in Brunswick Heads arose out of the “Taking Care of Brunswick” Community & Economic Development Plan, prepared in consultation with the whole community in 2004. There was talk of the Byron Shire Council preparing a Tourism Management Strategy, but we felt that Brunswick Heads could not wait. We needed a blueprint for protection urgently. The draft “Taking Care of Brunswick” Tourism Management Strategy 2004-2009 was subsequently prepared and presented at a public meeting at the Brunswick Heads Community Centre in 2004.

The work to brand the town and to attract the visitors who were compatible with our values was undertaken and the “Simple Pleasures” campaign was launched in 2005. The Visitor Centre was opened in 2006. Other actions in the Plan were successfully implemented over the next decade.

In 2017 the Brunswick Tourism Group started to revise and update the plan to reflect the new trend towards Tourism Destination Management Strategies. This was completed in May 2018 but was put on hold (as was the consultation with Brunswick Heads stakeholders) while we awaited the Byron Shire Destination Management Plan. However, the direction changed once again towards the preparation of a Byron Shire Sustainable Visitation Strategy. Our original strategy will now be revised as a 2020-2030 Sustainable Visitation Strategy to be in line with the Byron Shire Council Sustainable Visitation Strategy 2020-2030.

However, it is worthy to note that the vision, values, objectives and most of the strategies in the original 2005-2009 “Taking Care of Brunswick” Tourism Management Strategy are still valid and relevant. (See the Table of Contents below). Many of the strategies and actions have been completed. Our strategy’s key objective is still to ensure sustainable and well managed tourism into the future, and it still reflects much of the BSC Sustainable Visitation Strategy, despite it being 16 years old!

The BSC SVS appears to be Byron Bay centric. The surrounding towns and villages get a mention as being different from Byron Bay and from each other. However, many of the issues reported and solutions suggested are not relevant or applicable to Brunswick Heads. So we will be referring to the Brunswick Heads Tourism Management Plan throughout our submission.

## **“TAKING CARE OF BRUNSWICK” TOURISM MANAGEMENT STRATEGY 2004-2009**

### **CONTENTS**

#### **1. Introduction**

- 1.1 Byron Shire tourism planning
- 1.2 Brunswick’s Community and Economic Development planning history
- 1.3 The “Taking Care of Brunswick” Plan 2004-2009

#### **2. Planning Direction**

- 2.1 Objectives of the plan
- 2.2 Guiding Principles for development of the plan
- 2.3 Planning approach
- 2.4 The consultation process

#### **3. Core Values**

- 3.1 Lessons from Byron Bay
- 3.2 Objectives of the plan
- 3.3 Guiding principles for the development of the plan

#### **4. The Planning process**

- 4.1 A sustainable development planning approach
- 4.2 The process
- 4.3 Working with Byron Shire Council

#### **5 Key Result Areas - Guiding principles, Objectives and Strategies**

- 5.1 Environmental Sustainability - Natural area management
- 5.2 Culture & lifestyle
- 5.3 Communication
- 5.4 Land Use Planning & Infrastructure
- 8.2 Product Development & Marketing
- 8.3 Economic Sustainability & Prosperity

#### **8. Studies and audits**

- 6.1 The tourist market
- 6.2 Brunswick’s physical capacity - natural attractions, infrastructure & economic resources
- 6.3 Socio-economic impact of tourism
- 6.4 Environmental capacity



## FEEDBACK ON THE TOURISM RESILIENCE DISCUSSION PAPER

The format of our review is to either quote from the BSC Sustainable Visitation Strategy or summarise it (shaded) and to follow this with our comments and feedback.

### 1. PURPOSE

- To encourage discussion amongst the business & residential community
- To assist with developing a roadmap for an adaptive & resilient tourism sector

#### Comments:

*We agree. The Brunswick Tourism Group, Simple Pleasures Design Team and Holiday Letting Committee look forward to discussions with Council on the respective themes in the BSC Sustainable Visitation Strategy (SVS). Please advise when this will occur.*

### 2. FORECASTS

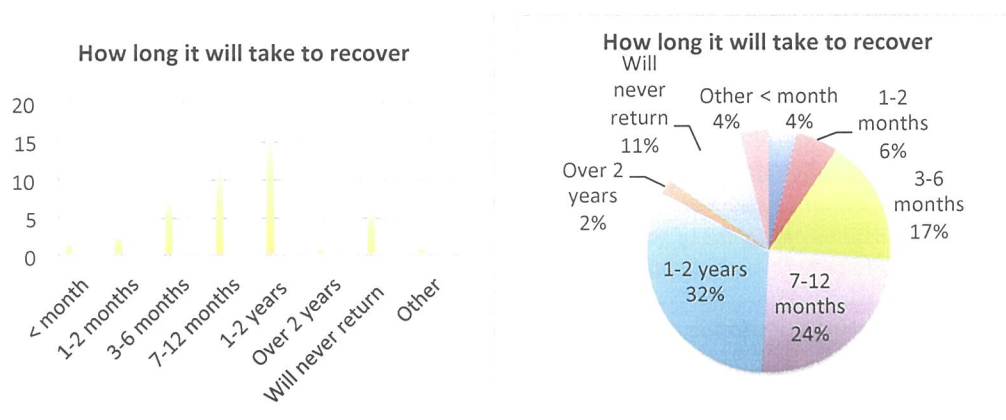
- Methodology was done month by month, market by market, day/overnight/international
- Key tourism industry stakeholders were asked to provide volume expectations for 2020 compared with 2019.
- Predictions for how long until visitation returns to pre-Covid levels
- Forecast figures

#### Comments:

*We support the methodology used, but bring to your attention that none of the key relevant Brunswick Heads stakeholders were contacted for information regarding volume expectations. We did, however, provide the Council with the findings from our COVID-19 Impact Survey. If used, this document should be included in the bibliography.*

#### A few of the findings from the Brunswick Heads Covid-19 Impact Survey:

- 81.1 % of the 53 businesses who responded said their revenue had decreased since Jan-May 19 because of Covid.
- The average % decrease for the 45 businesses who responded was almost 60% (59.4%).
- 66% of the 53 businesses who responded were on JobKeeper in the initial round of support (about 250 employees)



- **Nearly half the businesses (45.3%) thought it would take a year or more to recover from the pandemic.**
- 23.1% thought it would take them 7-12 months to recover from the pandemic
- 31.1% of business thought it will take 1-2 years to return to pre-Covid levels. This was the highest response.
- 2% of businesses thought it will take over 2 years to return to pre-Covid
- 11.3% of businesses say they will never return to pre-Covid levels

### 3. What is Council Doing?

- Council's role in the tourism sector is to support, promote and advocate for industry & community (P12).
- Council's Engagement with the Tourism Industry

#### Comments:

*We are interested in understanding who Council considers to be "industry". It will be evident in the BSC SVS chapter on visitor accommodation, that the three Managing Agents in Brunswick Heads are not considered to be part of the industry, It seems that only the Byron Bay resorts, motels, Bed & Breakfast and backpacker businesses were consulted. Is the Brunswick Heads Visitor Centre considered as part of "industry"?*



#### 4. What are State & Federal Governments Doing?

- National Tourism Restart Taskforce
- Tourism Australia & Destination NSW – Love NSW campaign

##### **Comments:**

*The Brunswick Heads Chamber ran a very pro-active campaign to support its businesses during Covid-19 and relayed all the relevant information from state and federal government to all our businesses (whether members or not). The Chamber also produced "Love Bruns" stickers as a follow on from the "Love NSW" Campaign.*



*We would like to see two additional headings, with some basic detail:*

1. *What is Destination Byron Doing?*
2. *What are the towns and villages chambers of commerce and tourism groups doing?*

#### 5. What do you think?

Council has invited our feedback on the following questions:

1. Is SVS still relevant & current?
2. Do any strategies or actions need amending in light of Covid?

##### **Comments:**

*As will be seen from our feedback on the BSC Sustainable Visitation Strategy, we believe that a lot more consultation with key industry stakeholders, including the four aforementioned Brunswick Heads Chamber groups and individual tourism operators, is required to provide the rigour that such a strategy requires.*

*Covid-19 had a devastating impact on our managed holiday letting industry and on our tourism operators. The accommodation sector has bounced back with strong bookings since November, but the tourism operators have been much slower to recover. It must be noted, however, that even though trade has picked up and in some cases appears to be very busy, our businesses had 6-9 months of little or no trade to catch up on.*

**Section 2 (Engagement & Research Informing the Strategy)** needs to be updated with post-Covid research and figures.

**Section 5 (The Present)** needs to be revised with information that reflects the new baselines for:

- 5.1 Visitor accommodation summary (as of early 2019)
- 5.2 Tourism Product Inventory (as of early 2019)
- 5.3 Changes due to growth in visitor economy (P39)

**Section 7 (The Byron Shire sustainable Visitation Strategy)** needs to be updated to take into account our feedback on many of the themes.

## THE DRAFT SUSTAINABLE VISITATION STRATEGY 2020-2030 DOCUMENT

### SECTION 1: STRATEGIC ALIGNMENTS

- Vision statement
- Values
- 6 Themes
- Use of local & international case studies

#### Comments:

See our comments in Section 7.

#### Byron Shire Tourism Management Plan 2008-2018

The document advises that ten key actions were undertaken from the 2008-2018 Byron Shire Tourism Management Plan.

THE KEY ACTIONS THAT BSC SAID WERE UNDERTAKEN	OUR COMMENTS
1. Two new Council roles were created - Tourism Officer & Events & Film Liaison Officer	Greatly needed
2. Renovation of the BB VC & Bruns VC	As will be commented on later, BSC should take no credit for the renovation of the Brunswick Heads Visitor Centre.
3. Introduction & implementation of the "Don't Spoil Us, We'll Spoil You" visitor brand	The brand was developed and launched during the life of the TAC, but strategies and actions to implement the branding campaign were largely ignored after this.
4. Improved access to info for visitors	No examples of this were given
5. Place making & laneway activation in Byron Bay to support alternative night time economy	Acknowledged
6. Development & launch of Byron Business Events Bureau	Acknowledged, but is no longer functioning. The Brunswick Heads Visitor Centre started a local Weddings Bureau on our website several years ago and we are keen to explore weddings in Torakina Park with marquee allowed and expand this sector of the tourism industry further.
7. Multiple activities promoting visitors to explore the whole shire	Apart from the production and distribution of the Byron Shire map we are unaware of any other activities undertaken by BSC. If this achievement includes the many activities undertaken by the Brunswick Heads teams, it should be acknowledged.
8. Introduction of paid parking in Byron Bay with resulting increased spending on roads & open space infrastructure	Acknowledged
9. Improved data collecting and recording	Perhaps provide examples
10. Productive relationships with gov't agencies, industry & regional stakeholders	Examples would be helpful. It must be noted that there was actually less interaction with the Brunswick Heads industry stakeholders, the Tourism Group and the Visitor Centre in the last 3 years. This improved slightly in the last 6 months.

**Comments:**

*See above for specific feedback on many of these “achievements”. We think that the achievement of only 10 outcomes is a very poor result over the ten year period. We believe that this is in part due to the disbanding of the Tourism Advisory Committee in 2012 which started to work through the 2008-2018 Tourism Strategy. This left a void in leadership and commitment to implement the remaining strategies.*

**NPWS – Cape Byron Reserve****Comment:**

*We would like to see other organisations, such as Cape Byron Marine Park represented under this section.*

**Global Sustainable Tourism Council**

The Global Sustainable Tourism Council (GSTC) is an independent organisation that strives to achieve best practice in sustainable tourism. It focuses on 4 key areas:

- Overall sustainable destination management
- Maximise local economic benefits
- Maintain & develop a sense of culture
- Maximise benefits to the environment

Underneath these are 41 criteria. Each of the Byron Shire Sustainable Visitation Strategy themes are written in line with the GSTC criteria.

**Comments:**

*The key focus areas above are in line with the Brunswick Heads Tourism Management Strategy. They are supported for the whole of the Byron Shire.*

## SECTION 2: ENGAGEMENT & RESEARCH INFORMING THE STRATEGY

### CONSULTATION (summary)

#### 1. Industry tourism issues workshops

5 workshops were undertaken throughout the shire, with a total of 100 people attending and 3 issues were identified - STRA, rural weddings and traffic.

#### 2. Talking future tourism kitchen table handbook & discussions

#### 3. Visitor focus groups

These focus groups were only undertaken by a consultant, Truth Serum, with visitors.

#### 4. Stakeholder interviews

20 interviews with Council staff were undertaken from March to May 2019 to understand the impacts of tourism on Council Services.

#### 5. Community Solutions Panel

26 randomly selected residents/ratepayers were selected and met over several weeks to answer the question: "What actions can Council take to align visitor behaviour with community values?"

The panel was presented with data and they were taken on a famil, where they also heard from stakeholders about issues and opportunities.

#### Comments:

*We are pleased with the multi-dimensional consultation. However, the level of engagement in the towns was poor. The engagement of only 100 people right across the shire is not a great outcome. The Brunswick Heads industry was represented by a few participants in the workshop and the Brunswick Tourism Group and Holiday Letting Committee combined for a kitchen table discussion. Apart from that there was no engagement with our industry. We feel the consultation was weighted more towards identifying the issues, some of which had been given considerable airtime in the media. Figures, assumptions and conclusions were made based on the Byron Bay experience without first checking in with the Brunswick Heads industry to ascertain whether these assumptions were correct.*

*It has been stated that the Community solutions Panel were taken on a famil where they heard from stakeholders about issues and opportunities. The business which experiences the largest number of day trippers was not spoken to, neither were any of the managing agents of our holiday rentals. Please advise which stakeholders were spoken to in Brunswick Heads as we have no knowledge of this occurring in Brunswick Heads.*

### RESEARCH – AUDITS

The following audits were undertaken:

1. Byron Shire accommodation audit (using websites, directories & walk arounds)
2. Byron Shire tourism product audit (of attractions, restaurants, wellness centres, transport & activities)
3. Industries that were identified as focus for attracting the right visitor mix:
  - Arts & creative industries
  - Indigenous culture
  - Well-being and health retreats
  - Nature based tourism
  - Business events and conferencing
  - Food experiences
  - Agritourism
  - Volunteer tourism
  - Eco-tourism

#### Comments:

*The Brunswick Heads Visitor Centre was consulted for the accommodation audit and provided up-to-date statistics. However, we are not aware of any consultation on our tourism products. (many of which are on our website). We think it would be beneficial to include the accommodation providers and products in the respective audits as appendices. This would provide a useful pre-Covid baseline for when a new post-Covid audit is undertaken asap.*

*The list of industries that were identified as the focus for attracting the right visitor mix needs further work in our opinion. If, as the strategy claims, each town and village has its own identity/brand, it follows that there would be variations in the desired visitor mix. In our "filtering" of the visitor market, we aim to attract those visitors who love Bruns for all the reasons that we do (ie share our values). This will understandably vary from town to town.*

We realise that the list of industries that the consultation identified as a focus for attracting the right visitor mix, we would like it noted that “Old fashioned family holidays and intergenerational gatherings” be incorporated into the strategy somewhere, as this is still an important focus for attracting the right visitor mix to Brunswick Heads.

#### What we learnt from accommodation & tourism product audits (P17)

BSC Sustainable Visitation Strategy points	Our comments & feedback
1. 57% growth in beds from 2008 to 2019	<i>This will have changed because of the impact of Covid-19. It will change again when the STRA Code of Conduct is implemented, because the number of beds per property is capped. In addition, the onerous requirements for some property owners will see a reduction in STRA.</i>
2. 13 camping grounds & caravan parks that account for 24% of bed spaces	<i>Brunswick Heads has 3 out of the 13 camping grounds (23%)</i>
3. The majority of accommodation is holiday houses, which accounts for 40% of bed spaces in the shire	<i>This tells you that this type of accommodation is sought after, and especially so in Brunswick Heads, with its large family market.</i>
4. The highest concentration of accommodation is in Byron Bay	<i>Not surprisingly, this is where the 3 identified issues arise.</i>
5. From 2008 to 2019 a decrease in the number of bed spaces within resorts, holiday apartments & guest houses.	<i>This is not the case in Brunswick Heads, where the accommodation audit will show that we have more limited accommodation options than Byron Bay – 3 Holiday parks, 4 motels, consistently about 55 managed holiday lets and approximately 20 other holiday rentals that are marketed through Air bnb</i>
6. The top 3 tourism products in 2019 were: <ul style="list-style-type: none"> <li>• Health &amp; wellness</li> <li>• Restaurants with evening trade</li> <li>• Festivals</li> </ul>	<i>The list of products audited has not been disclosed. Was eco-tourism included as one of the products in the audit? Were community festivals included in the audit of “festivals” in the shire? The list would be very different for Brunswick Heads.</i>

#### SECONDARY RESEARCH

BSC Sustainable Visitor Strategy	Our comments & feedback
<b>Forecasting</b> was undertaken using a combination of data-based analysis and market assessment over extended periods.	<i>Which, when and by whom? This information should be provided.</i>
<b>Case studies</b> were selected from local, national & international using regions with similarities to Byron Shire.	<i>There are excellent local case studies which have not been included (see later).</i>

### SECTION 3: BYRON SHIRE COMMUNITY PROFILE

The residential demographic data in this section includes residents, households, housing types. The towns and localities are grouped as follows:

- Byron Bay & Suffolk Park
- Mullumbimby
- Bangalow
- Brunswick Heads
- Ocean Shores, New Brighton, South Golden Beach & Billinudgel
- Emerging hinterland

**Comments:**

*We note that Suffolk Park is grouped together with Byron Bay Presumably this is because they are beachside locations. However, when the STRA precincts are considered Byron Bay and Suffolk Park are considered separately. We believe that the grouping of Ocean Shores, New Brighton, South Golden Beach and Billinudgel needs to be changed. North Ocean Shores, New Brighton & South Golden Beach should be grouped together as they are beachside areas. Ocean Shores & Billinudgel should be separated from the above as they are residential, not beachside. (See below).*

- Byron Bay
- Suffolk Park
- Mullumbimby
- Bangalow
- Brunswick Heads
- Ocean Shores & Billinudgel
- North Ocean Shores, New Brighton & South Golden Beach
- Emerging hinterland

### SECTION 4: THE PAST – OUR VISITOR ECONOMY TO 2019

Several pages of charts with figures up to 2019 are presented on pages 28-35.

Data on visitor volume was taken from National Visitor Survey & International Visitor Survey.

Expenditure data was taken from the above plus Tourism Research Australia's Regional Expenditure model (REX).

Definitions of Day Visitors & Overnight Visitors are based on the United National World Tourism Organisation.

- Domestic overnight visitors to Byron Shire up by 19.2% from Y/E June 2019 compared with June 2018.
- Domestic Day visitors to Byron Shire – gradual **decrease** in domestic day visitors.

**Comments:**

- *The data presented in the Byron Shire SVS is likely to be for Byron Bay only. We have been unable to attain visitor data for Brunswick Heads.*
- *That there has been a gradual decrease in domestic day visitors is interesting because it has been assumed that all visitor numbers are on the increase.*

## SECTION 5: THE PRESENT

Two surveys were undertaken to provide further insight into the “current” visitor economy.

### **Comment:**

*This was in 2019, pre Covid-19. These surveys will need to be undertaken again, as the strategies and actions will need to be designed to take into account the situation at the end of 2020.*

### **5.1 Visitor accommodation summary (as of early 2019)**

Council conducted an audit of visitor accommodation and capacity. (See results above)

Table 5 on page 36 shows:

- The number of holiday apartments were down by 1.36%
- The number of holiday houses were up by 257.3%
- **The number of bed spaces in Suffolk Park & Brunswick Heads has been stable for the last 11 years.**
- Bangalow, Mullum & OS/SGB/NB) had the most growth in bed spaces in last 11 years (200-300%)

### **Comments:**

*The report notes that the number of bed spaces in Suffolk Park and Brunswick Heads has been stable for the last 11 years. This confirms what the Brunswick Heads Holiday Letting Committee has been saying for some years. It would seem to be obvious that any reduction in the number of beds due to Council’s 90 day policy would result in a downturn of our village’s visitor numbers and have a detrimental impact on our tourism reliant economy.*

### **5.2 Tourism Product Inventory**

An audit was undertake of tourism products in the Byron Shire and grouped in categories.

### **Comments:**

*It appears that “tours” have been excluded from the inventory audit on Page 38. As of early 2019, several tours were operating in Brunswick Heads such as Byron Bay Eco-Cruise & Kayaks, whale watching tours, and Vision Walks. We suggest a “Tours” category be added, and that the above tours be included, along with those operating out of Byron Bay and other towns. The Mullumbimby Community Gardens could also be included.*

### **5.3 Changes due to growth in visitor economy**

The document notes several changes that have occurred because of growth in the visitor economy on Page 39. Three are mentioned – The impacts of STRA online, airport capacity and SE Queensland population growth.

**(a) The impacts of STRA online**, where owners can list & self-manage their properties, on:

- infrastructure
- traffic
- waste
- noise complaints
- upward pressure on house prices
- transition of stick from long term rental to short term

### **Comments:**

*STRA online has been described as “where owners can list & self-manage their properties”. Yet agent managed STRA has not been mentioned. The document must only be referring to Byron Bay, as Brunswick Heads holiday properties have not experienced the impacts listed above. If so, this should be made clear.*

## SECTION 6: THE FUTURE – FORECASTING VISITOR ECONOMY TO 2030

We are asked to refer to the Tourism Resilience Discussion Paper Oct 2020-12-07. See our comments in the first section.

### **Comment:**

*This section, with its 6 pages of charts, needs to be revised because of Covid-19. If La Nina persists throughout the summer season, further modifications will need to be made. For this reason we suggest that new data be collected after Easter 2020.*

## SECTION 7: SUSTAINABLE VISITOR STRATEGY

### VISION

Byron Shire Sustainable Tourism Strategy Vision	Brunswick Heads Tourism Management Plan Vision
Byron Shire welcomes visitors and supports a visitor economy that cares for and respects our residents, creates low-impacts visitor experiences, protects our natural environment, celebrates our cultural diversity and shares our social values.	<i>Brunswick Heads is a vibrant and diverse coastal village community committed to retaining its low key family friendly atmosphere, improving and protecting the natural environment and encouraging sustainable and innovative business development. We welcome those who share our vision and help to achieve it.</i>

### VALUES

Byron Shire Sustainable Tourism Strategy Values	Brunswick Heads Tourism Management Plan Values
<ul style="list-style-type: none"> <li>• <b>Respect</b> for community, nature, others and self</li> <li>• <b>Appreciation</b> of culture and social diversity</li> <li>• <b>Conservation</b> of the natural environment and biodiversity</li> <li>• <b>Diversity</b>, welcoming and acceptance</li> <li>• <b>Balance</b> of economic, social &amp; environmental impacts</li> <li>• <b>Cultural respect</b> for indigenous history and spiritually</li> <li>• <b>Live</b> in harmony and safety</li> <li>• <b>Lifestyles</b> of those who are active, healthy and sustainable</li> <li>• <b>Education</b>, enlightenment, searching and problem solving</li> <li>• <b>Balance</b> between laid back/relaxed and engaged/activist</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Maintenance of the quality of the village lifestyle</i></li> <li>• <i>Protection/preservation and restoration of the natural environment (ecological sustainability)</i></li> <li>• <i>Protection of our heritage &amp; aesthetic character</i></li> <li>• <i>Prosperity that is ecologically sustainable (economic sustainability)</i></li> <li>• <i>Social harmony, equity and respect for existing residents</i></li> <li>• <i>Inclusiveness, co-operation and co-operative leadership - village style communication where everyone counts</i></li> <li>• <i>Appropriate planning and development</i></li> <li>• <i>The value of innovation, finding new ways to realise the future that the local community wants</i></li> <li>• <i>We can be a model for the rest of the Shire</i></li> </ul>

### THEMES

Byron Shire Sustainable Tourism Strategy Themes	Brunswick Heads Tourism Management Plan Themes
<ol style="list-style-type: none"> <li>1. Leadership &amp; Destination Management</li> <li>2. Repositioning Byron Shire</li> <li>3. Culture</li> <li>4. Events</li> <li>5. Transport, Infrastructure and Open Spaces</li> <li>6. Planning for Visitor Accommodation</li> </ol>	<ol style="list-style-type: none"> <li>1. <i>Environmental Sustainability - Natural Area Management</i></li> <li>2. <i>Culture &amp; lifestyle (BS SVS #3 &amp; 4)</i></li> <li>3. <i>Communication (co-ordination linkages &amp; management)</i></li> <li>4. <i>Land use planning &amp; infrastructure (BS SVS #5 &amp; 6)</i></li> <li>5. <i>Marketing/messaging (BS SVS #2)</i></li> <li>6. <i>Economic prosperity and sustainability (BS SVS #2)</i></li> </ol>

#### Comments:

- *We support the Byron Shire vision and core values. We would also like to see work on core values by the previous TAC incorporated where relevant.*
- *The Byron Shire core vision and core values are consistent with those articulated in the 2004-2009 Brunswick Heads Tourism Management Strategy. (See above chart).*
- *The Brunswick Heads Tourism Management Plan also has 6 themes, and most of these are incorporated into the Byron Shire SVS.*
- *However, the Brunswick Heads TMP highlights the need for Environmental Sustainability - Natural Area Management, so it may be desirable for a similar theme to be adopted in the Byron Shire SVS.*
- *We also suggest that "Planning for natural disasters, pandemics and financial crises" be added as a 7<sup>th</sup> theme.*

#### 1. LEADERSHIP & DESTINATION MANAGEMENT

The Draft BS SVS states that "Being a leading sustainable tourism destination involves collaboration with industry, local government and the community.... The St Kitts case study reinforces the need for an advisory group so that industry, key stakeholder organisations and the community can work together to deliver the SVS and establish Byron Shire as a leading sustainable tourism destination."



**Comments:**

Currently, there is no overarching unified group that represents industry, community, government and key stakeholders. We wholeheartedly agree that there should be. The Byron Shire Tourism Advisory Committee (TAC) was established soon after the launch of the 2008-2018 Byron Shire Tourism Management Plan. The TAC was a well-functioning committee that made considerable headway especially in the areas of core values and branding. In our opinion, the TAC should not have been disbanded and do not understand why this occurred. The disbanding of the TAC has in effect meant that 10 years of tourism management has been lost. We therefore encourage Council to relaunch the TAC as a matter of urgency.

**Funding**

Effective leadership in destination management ensures there is adequate funding for implementation.

- Council operational funds
- Revenue from paid parking
- Voluntary Visitor Fund
- Grants
- Stakeholder partnerships
- Tourism levy
- Bed tax – said to be strongly supported by the community

**Comments:**

*It appears to us that there has been no appetite by Council or Councillors for prioritising tourism management or for the implementation of sustainable visitation planning since 2012. The introduction of a special tourism levy on "tourism businesses" was flagged in 2008, but this was shown not to be feasible, since special levies can only be applied to properties, not businesses. Many non-tourism businesses would have been unfairly caught in the net, and even more importantly, many tourism-only businesses, such as the non-council operated holiday parks, would have been exempt from the special levy.*

*Brunswick Heads managing agents were approached about participating in a proposed Voluntary Visitor Fund, but while ever our well managed holiday letting industry was under threat from Council's STRA proposals, THEY were not inclined to take on the extra workload required to collect the "voluntary donations".*

*Back in 2009 our representative on the TAC proposed that Council consider adding a "Tourism Levy" on all ratepayers, to match the Shire Wide "Biodiversity Levy", with the same small percentage applied. The rationale behind this suggestion was that everyone in the Shire would benefit from **well-managed** tourism. This idea was not taken up as some felt that the residents should not have to contribute, despite the tourism industry being a major employment provider. **We believe this idea should be explored again. It would have our full support.***

**Natural environment**

Visitors show preference for natural landscapes attractions & experiences and want to protect the natural beauty and untouched environment.

**Comment:**

*This being the case throughout the Shire, we would like to see more emphasis on this by creating a separate theme Natural Environment", with its own strategies, as the Brunswick Heads TMP has done.*

**Case studies**

Two studies outside the Byron Shire were used as best practice examples of Leadership and destination management.

- St Kitts & Nevis – West Indies
- NZ – Trees for Travellers

**Strategies to achieve the above**

1. Position Byron Shire as a leading sustainable and environmentally responsible tourism destination.
2. Investigate alternate methods to secure additional revenue streams from government and visitors to support the implementation of the SVS.

**Comments:**

*We agree with the proposed **positioning** of the Byron Shire as a whole. This was supported by the previous TAC and is also incorporated in the Brunswick Heads Tourism Management Plan.*

*We agree that alternative methods should be explored to secure additional revenue streams, but not only from government and visitors.*

*We believe that the proposal for a general tourism levy, much the same as the Biodiversity Levy, should be revisited, for the reasons outlined previously. This could be one of the tasks undertaken by the newly formed TAC.*

## 2. REPOSITIONING THE BYRON SHIRE

### Background

BSC Sustainable Visitation Strategy Vision	Our Feedback
Best practice destinations establish a clearly defined destination brand and image to promote the destination and encourage product development that attracts the desired visitor markets.	<i>The Brunswick Heads "Simple Pleasure" brand already does this. The brand was launched in 2005 and has been very effective in encouraging the visitors we want. However, we agree that destination branding for Byron Bay is needed.</i>
The "Don't Spoil Us, We'll Spoil You" brand was created for the shire.	<i>But was it seriously implemented? Apart from one sign at the entrance to Byron Bay, we have seen little evidence of a concerted campaign to get this message across to visitors.</i>
During engagement, the community stated it was a major concern that Byron Shire is not influencing the message to visitor markets and it wants to see ongoing communications and behaviour change programs fully funded with recurrent funding.	<i>This statement is not applicable to Brunswick Heads. In our Simple Pleasures branding and marketing strategy the VC plays a significant role in messaging to visitors. However, it does this without any ongoing funding. We agree that Byron Bay is in great deal of a messaging campaign to achieve the SVS objectives.  We agree that fully recurrent funding is needed, especially for the Brunswick Heads Visitor Centre. We support current funding for both Byron Bay and Brunswick Heads.</i>
A Council-led strategy for Byron Shire would endeavour to change the visitor mix, manage visitor behaviour and attract visitors who respect our community and environment, stay longer, are low impact, and want to explore various towns and villages within the shire. These are the visitors we want are those who share our values!	<i>Brunswick Heads is happy with its visitor mix, especially its highly valued family orientation.  Our Simple Pleasures brand was introduced precisely to encourage harmony with residents by attracting visitors who share our values!</i>

### Nature Based tourism development with NPWS

#### Comment:

*We would like to see mention made of other eco-tourism examples and potential partnerships, such as Marine Parks and DPI. There is also scope for inclusion of energy efficiency strategies and partnerships with Zero Emissions Byron and Enova.*

### Visitor Information Centres

The document states that the two visitor centres in the Byron Shire play a role in the quality of information given to visitors, and that research shows a decline in the amount of visitors using the centres in the last 10 years.

We are also advised that Council secured \$145K in funding from the Tourism Development Driver Infrastructure Fund to assist the Byron Visitor Centre with renovations. The document also states that the Brunswick Heads Visitor Centre also undertook its own refurbishment at 7 Park St Brunswick Heads.

As part of the work from the previous Tourism management Plan, both a Byron Shire and regional Visitor Services Strategy were developed. Many actions within these strategies have been implemented. It is recommended that these strategies be reviewed in line with future visitor trend.

#### Comments:

*We agree with the first statement. The Brunswick Heads Visitor Centre plays a crucial role in ensuring that tourism is well managed. The Brunswick Heads VC is a one-stop centre for information of what to see and do in Brunswick Heads as well as dispersing visitors to neighbouring towns and villages. Our team has the opportunity of educating our visitors about Simple Pleasures and our expectations that they respect our natural environment and our local residents, and that they support our local businesses.*

However, the claim that there is a decline of visitors using the Brunswick Heads Visitor Centre over the last 10 years is not correct. This “research” is nothing more than a generalisation, which does not apply to our Visitor Centre. Our walk-in statistics do not support this claim. Since its establishment in 2006, the Brunswick Visitor Centre has shown a steady increase in use, apart from in 2020 which was significantly affected by Covid-19 and closure of the Centre from March until 1 June 2020.

We have made several pleas over the last few years for financial support from Council towards our running costs. No funding has been forthcoming. Our Visitor Centre Committee has to find over \$120K each and every year to keep our Level 2 Accredited VC doors open 7 days per week. Unlike the Byron Bay VC, we pay market rent, and the VC Co-ordinator performs the role on a voluntary basis. The 3 part-time staff members, which together make up one full-time equivalent wage, need more hours, and the current VC Co-ordinator is due to retire in 2 years time. A \$20K - \$30K commitment from Council each year would greatly facilitate our succession plan.

We were therefore surprised that Council applied for funding for renovations of the Byron Bay Visitor Centre, but made no attempt to source funding for the Brunswick Heads Visitor Centre or for the renovations we undertook a couple of years ago from our own reserves.

We would therefore like to see some financial assistance for the Brunswick Heads Visitor Centre reflected as a strategy or action in the Byron Shire SVS and we look forward to be active participants in the review of the Visitor Services Strategy as suggested in the SVS.

### Branding Case Studies

1. The NSW South Coast “unspoilt” campaign
2. Repositioning Amsterdam as a tourism destination

#### Comments:

It is difficult to comprehend why there was no mention of the highly successful “Brunswick Heads. Simple Pleasures” branding campaign in this document. The brand was developed by the Brunswick Heads Chamber of Commerce, with a small grant obtained by the Chamber. It was launched in 2006 and is still going strong in 2020. It is still relevant (perhaps even more so).

### Strategy

The strategy in the SVS is to “create a communications and repositioning strategy to attract visitors with shared community values.”

#### Comments:

Brunswick Heads does not need to be repositioned. Our “Simple Pleasures” brand was designed to attract visitors with shared community values and this has been successful and is still working. However, we agree that Byron Bay needs to be repositioned. This particular strategy should therefore be directed at **Byron Bay**. The document should reflect the urgent need for the repositioning of Byron Bay, with perhaps a separate strategy to consider whether any of the shire’s other towns and villages, need repositioning and if so, how.

The term “Byron Shire” is often mentioned, when in reality the focus is usually on Byron Bay. This is another example that has led our team members to conclude that this is a Byron Bay centric Visitation Strategy.

There has also been no mention of the “Don’t Spoil Us, We’ll Spoil You” campaign in this section, which was an attempt to reposition the Byron Shire as a whole a decade ago.

### Actions

The Byron Shire Sustainable Visitor Strategy lists 10 actions, as follows:

Byron Shire Sustainable Visitation Strategy actions	Our feedback
1. Proactively engage with key stakeholders & agencies such as Tourism Australia, Destination NSW, Destination north Coast, and industry to change to values-based messaging for Byron Shire.	We agree for Byron Bay, but not for Brunswick Heads. We can’t speak for other towns and villages. Brunswick Heads has been proactively engaging with key stakeholders and agencies since 2005.
2. Collaborate with industry to encourage tourism product and visitor experiences that complement the brand, values and image of Byron Shire.	We welcome collaboration by the Byron Shire Council with Brunswick Tourism Group & our tourism industry. Our brand, Brunswick Heads. Simple Pleasures supports our values and fits well under the “Don’t Spoil Us, We’ll Spoil You” brand. Is that still the Byron Shire brand? We do not, however, identify with the current image of Byron Bay.

3. Continue to lead, educate, undertake and share tourism research, including trends, opportunities, visitor satisfaction and information.	<i>To date this action has not been undertaken by Council. However Destination Byron has undertaken much of this role. We agree with this as a desirable action, but who will implement this in the future? Perhaps delete "Continue to" if this is referring to "Council."</i>
4. Create a "Welcome to Byron Shire" program for visitors, and a Tourism Toolkit for industry, both aiming to lift customer service standards, provide product, destination and indigenous heritage information, and specify behaviour expectations.	<i>Yes, but who will do this and with what funds. Some funds should be allocated to each town/village Chamber/VC to continue the work that they already undertake in this area.</i>
5. Develop, through collaboration, a whole destination tourism wayfinding and signage strategy.	<i>We support this action</i>
6. Work with Byron Bay and Brunswick Heads Visitor Information Centres to improve the delivery of visitor information in line with future trends.	<i>Welcomed, provided some funding is allocated to this action.</i>
7. Review and update the Byron Shire Visitor Services Strategy.	<i>Welcomed. When will this begin?</i>
8. Lobby Destination NSW and Tourism Research Australia for regular inclusion of Byron Bay in the International Day Visitor Survey.	<i>What about other towns and villages? This is Byron centric!</i>
9. Undertake an accommodation and tourism product inventory audit every five years.	<i>Good idea, who will do this? Please consult the Brunswick Heads Tourism Group &amp; the Visitor Centre</i>
10. Undertake a review of the visitor economy forecast 2020-2030 annually.	<i>Agreed. We suggest after Easter in 2020 and thereafter. Who will do this?</i>

### 3. CULTURE

#### Background

<b>Byron Shire SVS background &amp; strategies</b>	<b>Our feedback</b>
Byron Bay and its hinterland are internationally renowned for community, creativity and connection to place.	<i>Add "and coastal towns" after "hinterland"</i>
Each town, rural village and their localities have their own distinctiveness and mix of cultural values.	<i>Agree. Yet this strategy is very Byron Bay centric.</i>
Council is in the process of developing an Arts & Cultural Policy.	<i>It is our understanding that this was done years ago. Should "developing" be amended to "updating"?</i>
Council, together with NPWS, can take strong leadership role in protecting the land by working to ensure visitors are not illegally camping, dumping rubbish and contributing negatively to the local culture.	<i>Agree. However, Council has not taken a leadership role in the issues at the Bruns Housie Shed and to address the impacts of the Sunday drumming at Torakina Park?</i>
Protect and enhance the indigenous, heritage, artistic and cultural diversity of Byron Shire	<i>Agree.</i>

#### 4. EVENTS

The BSC Sustainable Visitation Strategy covers only two aspects of events:

- Festivals, Events and filming
- Business Events and Conferencing

**Comments:**

*The Byron Shire SVS document does not mention the importance of the many smaller community events that contribute to the culture, identity and vibe of each town or village, in this section.*

*There was little or no engagement with Brunswick Heads by the Byron Business Events Bureau. Was this just intended for Byron Bay?*

*Much of the discussion on weddings is directed at rural weddings. Brunswick Heads is popular for laid back weddings and Torakina Park is a popular location. About 20 years ago a couple tried to facilitate simple weddings under a marquee at Torakina Park and were not given approval. Perhaps this should be discussed again, with the accountability as suggested in the SVS on P61. The Brunswick Heads Visitor Centre also created and managed an on-line Weddings Bureau several years ago and we would like to see this picked up again in conjunction with the investigation of suitable outdoor locations as above.*

**Case Studies**

1. Orange F.O.O.D. week
2. "Taking Care of Bruns during Falls" project

**Comment:**

*We are happy to share our model for mitigating issues caused by festivals with others.*

**Strategy and actions**

*Please include an additional action #6. "Work with Brunswick Heads stakeholders to investigate low-key weddings at Torakina & other suitable outdoor locations".*

#### 5. TRANSPORT, INFRASTRUCTURE AND OPEN SPACES

The top 3 issues raised during the consultations were traffic congestion, road conditions and parking. The multi-use rail corridor is noted as an example of an alternate mode of transport to cars for visitors.

**Comments:**

- *No specific towns or village were mentioned and probably should be.*
- *It would be helpful to note the very limited services provided by public transport to connect the towns and villages with each other. This was the main reason why the Green Frog shuttle bus service was created by Brunswick Heads as an alternative mode of transport for visitors to get the cars off the road. The project would have benefited from an injection of start-up funding by Council or other and could be brought to life again as an action to reduce the number of visitor cars on the road.*
- *The lack of public transport and in some cases no transport at all connecting the towns and villages to Ballina and Coolangatta airports could be noted. There has only recently been one shuttle bus from Ballina Airport to Brunswick Heads and now there is only one service between Coolangatta and Brunswick Heads. The poor transport between both airports and Brunswick Heads is a key contributor to the increased visitor dependency on cars.*
- *The multi-use rail corridor is mentioned as a strategy to address car dependency, but connectivity with towns and villages could be looked at.*
- *The solar train from Elements to Byron bay township should probably be included also.*
- *Because of the lack of public transport options, other alternatives should be explored under strategies and actions (such as the Green Frog and the proposed little Green Frog service running all day between the Byron Bay township and the lighthouse).*
- *Long term parking for all day visitors in Brunswick Heads should be investigated.*
- *The section on paid parking needs to be revised.*
- *No mention was made of Council's attempts to introduce Park and Ride.*

## 6. PLANNING FOR VISITOR ACCOMMODATION

### Visitor Accommodation

The draft Byron Shire SVS says that the community doesn't want to see high-rise hotel chains (over 3 storeys) or additional STRA. And the community wants to see a cross section of visitors throughout the shire.

It states that Council needs to investigate the feasibility of planning mechanisms that allow a variety of accommodation types to suit the different market segments the community wishes to retain and attract.

It needs to ensure **enough accommodation** in various areas that will :

- encourage dispersal
- decrease the likelihood of illegal camping
- facilitate minimal visitor impact on our communities and natural environment.

#### **Comments:**

*Byron Bay has an excellent range of accommodation types, including resorts, motels, backpackers, holiday parks, bed & breakfasts, serviced apartments and holiday apartments and houses.*

*Brunswick Heads has a smaller range of accommodation than Byron Bay, with 4 motels, 3 holiday parks, and approximately 75 holiday properties. The predominance of holiday parks and holiday accommodation suits our family market segment very well. We don't want backpackers, large resorts or serviced apartments, but a couple of bed and breakfast properties would be compatible with our "Simple Pleasures" brand.*

*We suggest that the addition of a strategy "to explore additional visitor accommodation options which suit the individual towns' and villages' market segments, where required."*

*It is disappointing that so much of the Byron Shire SVS is devoted to rationalising Council's proposed reduction in holiday letting properties throughout the shire, when STRA is largely an issue in Byron Bay.*

### Short Term Rental Accommodation

The SVS states that until a few years ago, these were mainly properties managed by real estate agencies. The document states that STRA is not effectively regulated through the planning system and maybe unlawful in many cases. It says better regulation is urgently needed to manage the impacts of STRA and improve safety for guests and hosts.

#### **Comments:**

*It is still the case that most STRA properties in Brunswick Heads are managed by real estate agencies, so the generalisation in the SVS needs to be qualified. There have been no studies to suggest there are issues with Brunswick Heads managed holiday accommodation.*

*This whole section needs to be revised because of*

- *The impact of COVID*
- *The State Government policy on STRA and the proposed Code of Conduct, which is not mentioned.*

### Impacts of the Code of Conduct

Earlier in the document, it is advised that the number of beds in Brunswick Heads has remained stable for 11 years.

#### **Comments:**

*This is also our experience in Brunswick Heads. We have produced an Accommodation Guide brochure for the last decade and the number of managed holiday rentals has consistently remained around the 55. It should be noted that the State Government Code of Conduct for STRA will reduce the number of beds because the number of beds per bedroom is capped. So there is no need to impose any further restrictions on holiday letting.*

### Southern Cross Uni Reports on the impacts of Air bnb on the community

Southern Cross Uni released a report in March 2019. Interviews and a survey were conducted to determine Byron Shire residents' views on the positive and negative impacts of Airbnb.

#### **Comments:**

*Firstly, the term "Airbnb" is frequently being used interchangeably with "STRA" or "holiday letting." This is not correct. Airbnb is a marketing platform. Many agent managed holiday properties are also listed on Airbnb, so any audits need to take this doubling up into account. Some STRA that are promoted through Airbnb are hosted, but many are not.*

Secondly, none of the Brunswick Heads managing agents were contacted by Southern Cross Uni. Was Brunswick Heads included in the interviews and the surveys undertaken? Any findings from the Southern Cross Uni work undertaken can only be applied to participating towns and villages.

### Key findings

#### Positive impacts

- Increased income for Airbnb hosts
- increased employment opportunities for locals
- increased local tax revenue

#### Negative impacts

- Reduced availability of affordable housing for residents
- Increased traffic congestion
- Increased waste management problems
- Increased infrastructure problems

The SVS states that most respondents preferred a model which involved on-site management for any STRA. It also states that most respondents (including Air bnb hosts) felt that STRA needs to be better regulated.

#### Comments:

- Under positive impacts, please add "benefits to the local economy from the multiplier effect"
- Each of the negative impacts above DO NOT APPLY TO BRUNSWICK HEADS. This should not be generalised.
- Preferences aside, has the viability(financial and otherwise of the above-mentioned on-site model been checked out with the experts? What about families, who want to stay in houses? The Gold Coast uses this model, but it's only viable with 3 storey blocks of apartments and it is very costly for the property owners.
- The Code of Conduct will provide a high level of regulation without the need for reduction in the number of days of operation per year.

### Southern Cross Reports on the impact of Airbnb on approved accommodation providers

#### Key findings

Southern Cross Reports	Our comments
Seven interviews were conducted with accommodation, tourism, neighbourhood and government sectors.	<i>These should be listed somewhere. Were any Brunswick Heads accommodation providers interviewed? Brunswick Heads 3 managing agents were not interviewed.</i>
This data informed the development of an online survey to which 57 approved accommodation providers responded.	<i>Which accommodation is "approved". This section implies that holiday letting properties, many of which have been operating for decades are 'not approved'.  If accommodation providers in towns other than Byron Bay were not interviewed, then the subsequent survey is flawed. The sample for the survey needs to be advised. What percentage of the sample does 57 respondents represent?</i>
More than 80% felt that the growth of STRA has led/contributed to an over supply of visitor accommodation in certain parts of the Byron Shire, decreased the potential viability of approved accommodation businesses, and created an unequal playing field for AAPs.	<i>Which are the "certain parts"? They should be noted. Which of the "approved businesses" have had their "potential viability" decreased?  Has the viability of the holiday parks and motels Brunswick Heads been researched? Were the Brunswick Heads managing agents included?</i>
Over 80% said their businesses saw decreases in occupancy rates, average net rates & net revenue in the last 2 financial years. The growth of STRA has resulted in them having to work harder in their accommodation job and feeling anxious & stressed. Most preferred a regulatory model, which involved on-site management for any STRA. Most felt STRA needed to be better regulated.	<i>If these findings were based on Byron Bay AAPs, they cannot be used to inform strategies regarding STRA in Brunswick Heads and to the north of Brunswick Heads, where there is only one motel.</i>

**Other comments:**

- Restricting non-hosted STRA to 90 days per year in Brunswick Heads or in the beach side suburbs north of Brunswick Heads will have adverse consequences on our economy, that have not been properly thought through.
- What is the rationale for reducing holiday lets in Brunswick Heads, North Ocean Shores, New Brighton & South Golden Beach, which are all seaside locations?
- As previously stated, Ocean Shore and Billinudgel need to be separated from the beachside locations of North Ocean Shores, New Brighton and South Golden Beach for the purposes of the STRA discussion.
- The prime target market for Brunswick Heads and the beachside locations north is families. We know that families want to stay in holiday houses, not Bed & Breakfasts or hosted accommodation without full facilities. Families with pets do not want to stay in hosted accommodation.
- Council is required by the State Government to undertake economic impact studies on any areas where they propose the number of permitted days of operation to be reduced from 365 days per year. We know that further restrictions will have an adverse impact on the economy.
- If Council is concerned about the shortage of permanent rentals, we suggest that the following be added to the the list of actions on Page 69.
- **“Council undertakes an audit of all garden flats in the Byron Shire and ensures that they are not used as STRA for visitors”.**
- The scarcity of permanent rental accommodation in Brunswick Heads recently is because wealthy people outside the Byron Shire have been buying up properties in Brunswick which had been on the rental market to live in them themselves. Please consult with our 3 real estate agents to confirm this trend.

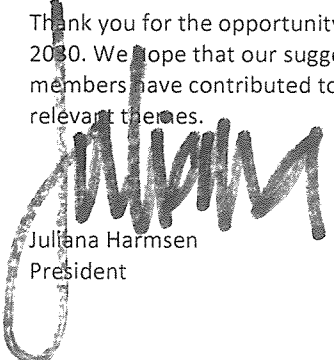
**Case studies**

How STRA will work under the new framework and the information in this section are not “Case Studies”.

Byron Shire SVS	Our feedback
Hosted STRA is similar to B & B with a host on-site.	Strategies are needed to encourage B & Bs in towns where they are desired. Eg incentives
Non-hosted STRA is a typical holiday house experience	Yes, and this has been the predominant visitor accommodation for over a hundred years, and what our market segment wants. There is no reason to change the status quo in Brunswick Heads.
It is anticipated that hosted STRA will be permitted 365 days per year, while non-hosted STRA will be limited to a certain number of days per calendar year, in recognition of the greater impact unsupervised accommodation can have on neighbourhood amenity and dwelling supply	<p>There is no way of ensuring that the hosts in hosted accommodation will be on site for any or all bookings. On the other hand, our managing agents proactively supervise their holiday letting properties, with 24 hour hot lines to deal with any urgent issues that could affect neighbourhood amenity.</p> <p>The reduction of number of days per year for non-hosted STRA will not ensure there is adequate rental accommodation.</p> <p>The Brunswick Heads Tourism Plan, Simple Pleasures branding and the Visitor Centre, with its proactive messaging, offer strategies that retain harmony between visitors and residents in our village.</p>

**CONCLUSION**

Thank you for the opportunity for providing feedback on the Byron Shire Sustainable Visitation Strategy 2020-2030. We hope that our suggestions, changes or additions are seriously considered. Our subcommittees, whose members have contributed to this submission, look forward to further consultations with Council staff on the relevant themes.



Juliana Harmsen  
President



## **Submission on the draft Byron Shire Sustainable Visitation Strategy 2020 to 2030**

**By Kathryn McConnochie 11.12.2020**

**Email Address:** [REDACTED]

I am a resident of Byron Bay and have lived in the town for 36 years since 1985.

All quotes in Italics below are from the Sustainable Visitation Strategy (SVS) or the Tourism Resilience Discussion Paper.

*“Considering the information contained within the tourism resilience discussion paper and the content of the Byron Shire Sustainable Visitation Strategy (SVS) – do you believe the SVS is still relevant and current?”*

I believe that the figures for the return of tourism to Byron Shire after the COVID-19 lockdown are highly inaccurate. Visitor numbers were not expected to return to 2019 numbers until 2024. Considering the massive boom in domestic tourist numbers in the last 2-3 months, tourist numbers have overtaken all predictions of recovery, despite the loss of the 9% International tourist market. The international market has been more than compensated for by the boom in domestic travel to Byron Shire. Australian residents cannot travel overseas easily, therefore Byron Bay was the furthest destination north in NSW that they chose to visit. This was especially relevant before the QLD border opened fully.

Byron Bay & other towns in the Shire are fully booked out & have been for the past 2 months and remain fully booked out until the end of February. This is an unprecedented situation.

*“Do you believe there are any strategies or actions from the draft Byron Shire Sustainable Visitation Strategy 2020 – 2030 that need to be deleted or amended in light of COVID-19?”*

*No Comment – no time to compare the documents.*

### **The draft Sustainable Visitation Strategy (SVS) for Byron Shire**

This document is incomplete without including the Principles of Ecologically Sustainable Development.

Australia’s National Strategy for Ecologically Sustainable Development (1992) defines ecologically sustainable development (ESD) as:

***“using, conserving and enhancing the community’s resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.”***

*“ESD requires the effective integration of economic, environmental, social and equity considerations in decision-making processes. ESD aims to provide for the needs of present generations without compromising the ability of future generations to meet their own needs.”*

In particular I want to emphasize the importance of Inter-generational equity in a Sustainable Visitation Strategy for Byron Shire:

*“The present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations”*

<https://www.edo.org.au/publication/what-is-ecologically-sustainable-development/>

I would also like to emphasize the need for this Sustainable Visitation Strategy to acknowledge Principle 4 of the “Rio Declaration on Environment and Development” 1992, of which Australia is a signatory.

Principle 4

*“In order to achieve sustainable development, environmental protection shall constitute an integral part of the development process and cannot be considered in isolation from it.”*

[https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A\\_CONF.151\\_26\\_Vol.I\\_Declaration.pdf](https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_CONF.151_26_Vol.I_Declaration.pdf)

Environmental Sustainability has been largely omitted from this document. This urgently needs to be redressed. Tourist visitation to the Shire is inextricably linked to ongoing impacts and effects on the natural environment and this must not be overlooked.

Sustainable water usage by the tourist industry has not been mentioned in the draft Strategy. Our potable water is a resource which is supplied by Rous County Council, comprising delegates from three local Councils of which Byron Shire Council is one.

There is no Byron Shire Council program for water efficiency that is available for use by the tourism industry in the Shire, let alone businesses and residents. This is a major omission and urgently needs to be redressed, considering the limited water supply currently available from Rocky Creek Dam.

Sewerage treatment and disposal is another environmental consideration which has not been mentioned in this strategy. Byron Shire’s sewerage treatment system has reached capacity. The tourist numbers of 2.4 m annually & rising each year are impacting enormously on this issue.

### **Theme 1: Leadership and Destination Management**

What is Sustainable Tourism? This question needs to be asked & answered by Council, Destination Byron and the community. The studies in the first part of the document, Section 6, pg. 40, show that “Total visitor numbers are expected to reach 3.86 million in 2030”. Considering that they are approximately 2.4 million in 2019 & that number looks set to be exceeded in 2021, that is an increase of 1.46 million people over 10 years. I think that figure is underestimating what is really happening.

In 2016, tourism increased by 500,000 people in one year, according to Government websites. At present there are approximately 34,000 people living in Byron Shire & 15,300 ratepayers funding essential infrastructure for 2.4 million visitors & climbing (despite the temporary drop in numbers due to COVID-19). I can’t see how that is a sustainable situation.

When do we reach a point when the town is full to capacity & any more people will cause a tipping point where traffic becomes totally dysfunctional every day? This is almost happening now. The town roads were built for a small population and there are limited entry and exit points.

Real estate prices have been driven so high by tourism and holiday letting etc that the local community of Byron Bay has largely been priced out of the home ownership & rental market. This is not sustainable.

### **Re Funding, Pg. 48 & 49.**

Council needs to encourage businesses providing accommodation and Air BnBs & similar short-term holiday letting (STHL) to implement a Voluntary Visitor Fund. If they won't do this, then their rates should go up. Residential accommodation used all year for Air BNB & similar, should be on a higher rate scale than fully owner-occupied residences, as they are defacto businesses.

Business rates should be increased & owner-occupied residential rates and long-term rental residential rates remain stable in the foreseeable future. Too much of the burden of supplying & maintaining infrastructure that the tourism industry relies upon is provided by residential rate payers. This is unfair. A large proportion of residential ratepayers do not benefit financially from tourism & resent paying for its impact on infrastructure via the highest rates on the North Coast.

**The burden on infrastructure through increased tourist numbers, must be shouldered by the business community & STHL residences, either through increased rates or other revenue collection. It must not be funded by owner occupied residences or owners of long-term rental residences. It is unsustainable for residential ratepayers like these, to fund infrastructure shortfalls by further rate rises.**

### **Pg. 49**

*"Our consultation reinforced that many visitors also want to protect the natural beauty and untouched environment. Visitors want to be made aware of their responsibilities when visiting a place of natural beauty and be educated about sustainability and the environment."*

*"Many residents, however, see visitors as disrespectful toward the environment and have voiced the need for an increase in education, signage, infrastructure..."*

As noted in the quotes above: Byron Bay desperately needs a centre to educate visitors about the natural environment. This is what the majority of Byron Shire's tourism is based on – visiting the natural environment, whether it is the beach, the ocean, bushland or the rainforest. There is no centre or even a single room in the Shire to learn about it. Council needs to make a space available for an Ecology Centre or a Natural History Museum in order to educate visitors about the natural environment. This will encourage visitors to understand & appreciate our natural environment & therefore they will care for it better.

### **Pgs. 49 & 50**

St Kitts & Nevis West Indies

I strongly support this statement:

“This case study reinforces how important it is for Byron Shire to reinstate an advisory group so that industry, key stakeholder organisations and the community can work together to deliver the Sustainable Visitation Strategy and establish Byron Shire as a leading sustainable tourism destination.”

Support must be given to environmental education & environmental volunteering by residents and visitors.

#### **PG 51**

I strongly support the following strategies:

1. *Position Byron Shire as a leading sustainable and environmentally responsible tourism destination.*
2. Investigate alternate methods to secure additional revenue streams from government and visitors to support the implementation of the SVS.

Strong support for the following actions: -

1. *Develop, in partnership with industry and government, a multi-year action plan and budget to implement the SVS.*
6. *Investigate the opportunity to design a Byron Shire Eco Check program to assist tourism businesses implement environmentally friendly and sustainable business practices.*

7. *Encourage and work with local environmental groups to develop volunteer tourism initiatives*

I work with a local Environment Group in regenerating local bushland. I can work with and train volunteers in non-chemical methods of regeneration.

8. *Implement and review approved funding options annually.*

See my comments above regarding funding.

#### **Theme 2: Repositioning Byron Shire**

#### **Pg. 55**

*“By developing a strategic communications and repositioning strategy (including product development and behaviour change), Byron Shire will shift the image of a party and nightlife destination to a more nature-based, alternative, health and wellbeing destination, attracting like-minded visitors with shared community values.”*

I strongly agree with this. Byron has been attracting people who want a short stay to party & then leave. This type of visitor does not appreciate the natural environment or the social & cultural values of our Shire. They give tourists a bad name through drunkenness, excessive noise & breaking the law. They do not contribute anything besides money for accommodation (hostels or shared holiday lets) food from supermarkets & alcohol. We are better off without them.

Strategy: *“1. Create a communications and repositioning strategy to attract visitors with shared community values.”*

I strongly agree with this strategy & some of the concurrent actions.

### **Theme 3 Culture.**

#### **Pg. 58**

*“Council, together with the National Parks and Wildlife Service, can take a strong leadership role in protecting the land by working to ensure visitors are not illegally camping, dumping rubbish and contributing negatively to the local culture.”*

Council can only do this through an increase of funding for its rangers – ditto with the National Parks and Wildlife Service, whose funding has been drastically cut by the State Government.

There are not enough Council Rangers enforcing compliance with illegal camping. They need to regularly patrol the beaches & other well known illegal camping spots from 1am to 5 am each week. This entails more funds for ranger employment & the money should come from the Business Rates as in Pg. 3 of this submission.

### **Theme 4 Events**

#### **Pg. 59**

*“In the 2018 calendar year, Byron Shire Council approved or supported around 90 events over 170 event days and with over 372,000 attendees.*

*To put this in perspective, event attendees represent more than ten times the shire’s resident population. This does not include events which occur in already approved venues or those events, weddings or filming that are not approved by Council or that Council has not been notified of.”*

*“In developing an events strategy, Council can coordinate and manage the shire’s weddings, business events and conferences, festivals and events as well as research their economic impacts, and collect and analyse demographic, marketing and visitor satisfaction data.”*

The last paragraph in the “Background” to events in the SVS, makes no mention of the environmental impacts of events and how Council will manage them.

I am at a loss as to how Council can consider that bringing increasingly huge crowds of people to the Shire is a “sustainable” thing to do. Byron Shire cannot cope with the water usage of such huge influxes of people. Consequently, there is now a demand for a second dam to be built, in large part to provide water for the massive tourist population that is ever expanding in this Shire. This is a dam which Rous County Council is promoting to be built at the Channon Gorge, a highly significant and rare rainforest on sandstone, to quote Rainforest Botanist, Nan Nicholson:

*“The ecological effects of the dam would be disastrous and on their own should be sufficient to stop the dam. The 62 ha of Endangered Ecological Community (EEC) of Lowland Rainforest at the dam site represents a significant portion of the 1% of the Big Scrub that now remains. No more loss can be tolerated. 7ha of the EEC is extremely rare Warm-temperate rainforest on sandstone, almost unknown in this region.*

*72 ha of eucalypt forest would be cleared, drowned or fragmented. This represents critically important koala habitat and koala corridors. Overall, nine threatened flora and 17 threatened fauna species would be impacted by the dam.”*

Byron's Sewerage treatment plants cannot cope with the massively raised levels of sewerage from such events, such as music festivals. Belongil Creek & its dependant ecology is already suffering from an overflow of treated sewerage water which could be used for recycling and purification to provide potable water.

The very thing that tourists come to this area to see, the biodiversity of the natural environment, as noted in this Strategy on Pg. 49, is under threat from having huge influxes of tourists. If we do not develop sustainable water use strategies and sustainable sewerage systems, there will be an irreversibly negative impact on the natural environment – which is the main attraction of this area. When this happens, Byron Shire will end up being very similar to the Gold Coast – where tourists no longer want to visit. We are killing the goose that laid the golden egg by overpromoting the Shire and not keeping pace with the sustainable infrastructure technologies of the 21<sup>st</sup> Century.

### **Pgs. 59 & 60, Filming**

*“Over the last few years there has been a significant increase in the number of filming requests in Byron Shire. Guidelines are required to ensure all filming requests are complementary to the brand and image of Byron Shire and ensure a positive reinforcement of community values.”*

This section consisting of 2 sentences, is extremely inadequate & needs to be given much more attention & for detail to be filled in.

‘The Tourism Resilience Discussion Paper’ states the Following:

*“Byron Bay is now a filming hot spot due to the efforts of Screen Australia, which is attracting a growing number of cast and crew, who are also supporting the local visitor economy with medium term accommodation.”*

There are many unanswered questions from the community & ratepayers about filming being allowed in this Shire, as the following incident illustrates.

In November – December this year there were 3 films being shot in Byron Shire, with 100 film workers needing housing at a peak holiday time. The town was fully booked in fact overbooked from domestic tourists and “Schoolies”. Hence there were traffic jams every day in town.

It was also a time of major roadwork resurfacing into the main town access along Shirley St. On the 23<sup>rd</sup> & 24<sup>th</sup> of November the streets of Byron Bay were gridlocked as a result of the roadwork, people were caught in the traffic for 1.5 hrs. The only alternative route to the highway from residences South of Byron Bay, where I live, was via Bangalow Rd to St Helena Rd or to Bangalow and on to the M1.

Bangalow Road was closed from where it joined Coopers Shoot Rd, at Hayter's Hill, because the entire road into Bangalow had been closed for filming. Several police officers and roadworkers were stationed at this point directing traffic onto a detour via Coopers Shoot and then onto Broken Head Rd till it joined the highway, many kilometres south of Bangalow.

This meant that the town was impassable & there was no alternative access via the only detour around the town via Bangalow or St Helena Rd. This a totally unacceptable situation. Not only was it unsafe in case of an emergency, it showed a complete lack of disregard for the community and their

right to have open access to roads, due to the precedence given to the film Industry. Many people missed important appointments or work commitments due to this lack of coordination & planning.

This situation was totally unsustainable. There should be a limit on film crews being in the Shire, of one film crew at any one time. Film crews should be discouraged from coming to the Shire at peak holiday times. They should not be allowed to close major road routes. There should be transparency of fees paid by film crews.

It begs many questions:

Why can't Council plan their road closures more strategically? EG resurface roads at night time.

Why did they allow closure of the two main routes from town to the highway at the same time?

How can film companies obtain the legal authority to close sections of major roads?

Who is paying for the police & roadworkers to be onsite at a road closure for a film?

Why is Byron Bay being promoted as a "hot Spot" for filming?

How much per hour are film companies paying to Byron Council for the right to hire & close off major roads?

How much are film companies paying to Byron Council per hour to use public areas for filming?

Do we want the huge increase in tourism that comes as a result of films made in this Shire?

The increase in domestic tourism that Byron Bay is experiencing in November/December this year is the largest increase that I have ever witnessed in the 36 years that I have lived in the town. Byron Bay is bursting at the seams & cannot accommodate any more tourists.

### **Theme 5: Transport, Infrastructure and Open Spaces**

*"Improved and additional parking will encourage longer lengths of stay by visitors and improve amenities for residents. However, there are also pressures to reduce parking and provide better alternatives such as public transport, cycling, walking pathways and renewed open spaces."*

There should be free parking areas made available. Especially for residents of the Shire who are disadvantaged by paid parking in Byron Bay.

Council has spent much time and money on extending the cycle way from Byron town to Suffolk Park. However approximately 50% of cyclists do not use the cycleway & continue to use the traffic lanes of the road. This is a frustrating situation for motorists. I use this road daily & I'm constantly dismayed by cyclists who persist in using the car lanes instead of the cycleway.

The recent line marking by Council on the stretch of resurfaced road from the High School into Byron town has confused and exacerbated this situation. This confusing line marking needs to be remedied.

There needs to be a public education campaign for both locals and visitors and better signage to publicise the cycleway & assist in remedying this situation.

Council needs to focus on progressing the Multi Use Rail corridor as quickly as possible. The Shire desperately needs this option to alleviate traffic congestion and reduce carbon emissions from cars. It is also desperately needed to provide increased public transport options for residents.

### **Theme 6: Planning for Visitor Accommodation**

#### **Pg. 67**

*“Council needs to investigate the feasibility of planning mechanisms that allow a variety of accommodation types to suit the different market segments the community wishes to retain and attract. It needs to ensure enough accommodation in various areas that will encourage dispersal, decrease the likelihood of illegal camping, and facilitate minimal visitor impact on our communities and natural environment.”*

Council needs to provide more low cost camping areas with the minimum of basic facilities to alleviate the illegal camping that is rampant in the streets and in the reserves of Byron Shire.

#### **Pg. 68**

*“Despite the popularity and wide-spread adoption of online-booked STRA in NSW, it is not effectively regulated through the planning system and may be unlawful in many cases. Better regulation is urgently needed to manage the impacts of STRA and improve safety for guests and hosts.”*

*“Council is currently working on a planning proposal that seeks to introduce new planning rules for short-term rental accommodation through an amendment to Byron Local Environmental Plan 2014. Options currently under consideration include limiting non-hosted accommodation (where the host does not reside in the dwelling during the accommodation period) to a maximum of 90 days per year, as well as introducing appropriate standards for parking, occupancy, fire safety and neighbourhood amenity.”*

I fully support the comments in the text above. I fully support the introduction of a 90 day cap on STRA (or STHL), the 90 day cap on holiday letting is long overdue. The loss of approximately 3,500 (& rising numbers) of complete homes to the online booking agencies has had a disastrous impact on the lack of rental accommodation & the price of rentals in Byron Shire.

New planning rules urgently need to be introduced for STRA regarding parking, occupancy, fire safety and neighbourhood amenity.

### **Conclusion**

I understand that tourism provides jobs for over 60% of residents in the Shire, however the massive boom in domestic tourist numbers in the last 2 months has overtaken all predictions of tourist recovery, despite the loss of the International tourist market.

From my perspective as a resident, not involved in the tourist Industry, the quality of life in this town has dropped drastically over the last 20 years due to the huge increase in tourism over that time. Byron Council, the Chamber of Commerce, the State Government and Destination North Coast, Destination Byron etc need to seriously consider the issues arising from mass tourism and refrain from over-promoting Byron Bay as a tourist destination.



Mass tourism has caused enormous social and environmental problems in tourist hot spots around the world. Byron Shire Council, the State Government and other tourist bodies need to heed the negative impacts of mass tourism and act on preventing them, before the damage becomes irreversible. (Reference "Overbooked: The Exploding Business of Tourism and Travel", Elizabeth Becker, 2013).