

Comments Received:	Comment:
<ul style="list-style-type: none"><li>No. 8 Moir Street has been operating a short term residence for a period of time.</li></ul>	<p>We commenced short term rental operations in November 2017. In January 2018 we received notice from Town of Vincent that we needed to apply for a license, but that the policy of the city was to work with owners to facilitate this.</p> <p>At all times since then we have complied with city's instructions and have been diligently working on the license. When notified at the end of July that we needed to cease operations until the license was approved, we did so, at considerable cost and inconvenience due to the very short notice given (two weeks) which resulted in us having to cancel some 5 weeks worth of bookings.</p> <p>It should be noted that throughout 2018 we have been in regular contact with different staff at Vincent resolving many issues relating to the license which the staff themselves were not sure how to handle. This included Building and Planning, who initially informed that the change of use would imply a change of classification of the property and associated need to provide disability access. After many months of consultations and finally an opinion from the WA State authorities, this opinion was reversed and in August 2018 Vincent informed us that NO change of classification would be required.</p> <p>Similarly, it took months to resolve the issue of parking permits and what would happen once the change of use license was approved.</p> <p>Therefore, the delay in getting the license has been due to the inexperience on both sides in terms of what is required and how best to meet those requirements. The ability to keep operating whilst resolving these issues has been instrumental in allowing us to better understand the parameters of operating as a short term dwelling and to develop a much more comprehensive and viable management plan.</p>

- It is a heritage area and we feel the short term applications will destroy our community overtime;
- The use of the property as a short term dwelling is inconsistent with the amenity and heritage values of the precinct;
- The short stay use will erode the unique cultural heritage significance of the precinct by allowing the existing single house to be used for commercial purposes/commercial gain;
- Allowing commercial uses such as short term dwelling within the Brookman and Moir Street precinct areas will erode the residential character, social values and heritage fabric that makes the precinct so unique;
- We object to the short term dwelling because it does not reflect the dynamic of community feel;
- This short term dwelling is likely to set a precedent for others to contemplate doing the same and at the same time dilute the street feel of residential and the sense of community that has developed over the past 5-10 years;
- The Moir and Brookman Street precinct is a closely knit community and it would be extremely unfortunate to have the positive community tenor compromised by continuation of the short term dwelling arrangement;
- Owners and residents choose this area because of the history with heritage. Everyone tries to upkeep and uphold the heritage feel of the precinct and going to short term dwelling will prevent this ongoing upkeep;
- The area is fully residential. The concept of a short term dwelling changes the area to be semi commercial as a holiday house or short stay accommodation which will provide a completely different feel to the whole street;

In response, I would like to highlight that:

1. Heritage does not imply no change, merely that the change is managed and respectful of the history of the place.
2. The Moir and Brookman precinct has, for the vast majority of time since its construction, had a high percentage of rental properties, in particular to new immigrants. Therefore, offering the opportunity to foreigners to experience living in a house in Moir St is completely in keeping with its heritage.
3. The owners of houses in the precinct have benefited from public funding to renovate their houses, and have benefited in higher property values due to the huge public investments in tourist and public amenities in the vicinity. It is therefore unethical to seek to restrict access to the precinct only to owner-occupiers, as these investments were meant to provide benefit to the entire public.
4. The Heritage Council of WA has a published strategy for Heritage Tourism that specifically promotes making heritage buildings accessible to tourists, as these are of higher quality and spend more money than the average tourist.
5. Some of the received comments are xenophobic in nature, implying that all the residents of the street are perfect citizens in a perfect community, while short-term tenants would have only negative impacts. In fact, most tenants have been either Australians or foreigners, mainly families with kids, visiting friends or family in Perth. If the street community were truly reflective of the heritage of the area, they would be welcoming to such visitors and seek to benefit from interacting with them, instead of rejecting them as unwanted intrusions.
6. Operating as short-term dwelling is completely compatible with restoring and maintaining the house in accordance with its heritage quality. Evidence for this is abundant in Northbridge with heritage properties used for many different purposes.

I provide more detailed comments on these points below:

Heritage in and of itself does not preclude the change of use of the property or a change in character of the street over time. In fact, it is this very evolution over time that defines the character of the street and its heritage value.

The listing of Moir and Brookman streets in the Heritage Register reflect this:

- We are concerned as to whether this type of dwelling is suitable for this neighbourhood;
- If the proposal is approved, then it creates a precedence and more people may want to do this in the Brookman-Moir Precinct and this is not in keeping with the heritage character of the area; and
- One of the aims of the heritage listing of the precinct is to encourage people to purchase properties and restore them to the original as much as possible. Converting houses to short-term stay dwellings is not in keeping with that character.

*the properties were originally constructed in 1987 for blue collar workers. By 1921, however, owner occupancy was only 70% (ie 30% were rented out) and the owner occupancy dropped much lower in WWI, only rising to 70% again in the 1990s! Surnames indicate that many of the residents were often migrant families, initially from Europe but later from Asia.*

Media reports following the heritage awards given to the precinct in recent years give more detail: The properties were originally built as a real estate project and let to blue collar workers who needed to live close to the city to save on transport costs during the heyday of the gold rush. But once the economic situation changed, the properties began to be sold off individually in the 1920s. The middle class residents moved out to the new suburbs and the precinct fell into disrepute and disrepair, providing cheap accommodation for poor migrants. This lasted through to the 1980s, when the redevelopment of Northbridge and the revitalisation of the city centre to the mining boom and increased tourism, combined with ever increasing commute times to outer suburbs, made inner city living attractive once again. Rising rents and real estate prices provided owners with the financial incentives to restore the houses and the City supported these efforts with Heritage grants in order to complement the other developments in adjacent zones, including the Northbridge entertainment district.

The heritage value of the street therefore comes from all these historic *changes* in society, economic cycles, and city planning. Trying to “freeze” the situation of the street at a moment in time that suits some owners (but not others) is not consistent with the perspective of Cultural Heritage as a continuously evolving combination of tangible assets and intangible social and cultural aspects. In any case, for the vast majority of time since the properties were erected a significant percentage were rented out – the current dominance of owner-occupiers is NOT consistent with the historical use.

Furthermore, one of the main objectives of Heritage Listing and Preservation is to make the heritage accessible to the general public and to tourists. This is reflected in WA’s heritage tourism strategy:

<http://www.stateheritage.wa.gov.au/about-us/education-research-events/heritage-tourism>

Restricting access to Moir and Brookman Street properties only to owner-occupiers would run directly contrary to this strategy. Making a number of

	<p>properties in the street available for short-term let to tourists would directly support the WA strategy! As stated by the WA Council Heritage website <i>“It is the desire to understand what makes a place special and unique that has fueled the growth in heritage tourism. Heritage tourists tend to stay longer, spend more, and seek out experiences in museums and art galleries, historical and heritage buildings, sites and monuments.”</i></p> <p>The assertions in the received comments that short-term let is inconsistent with the heritage of the street or that heritage implies that the only use of properties in the street should be for long-term residents or owner-occupiers are therefore not valid.</p> <p>Also, it is inconsistent that owners who have directly benefited from the rise in local real estate values due to the tourism developments in the immediate vicinity, and have availed themselves of public funding for Heritage preservation that should be of benefit for the wider public, wish to shut themselves off from that public and those tourists and have exclusive enjoyment of the heritage character of the street. Rather than reject the short-term tenants as interlopers and unwelcome outsiders, the “community of the street” should be welcoming – Perth is not a party destination and the property is not marketed as a party house: most tenants are either Australian or foreign friends or relatives of Perth residents who are in the city visiting locals, or newly arrived immigrants who need to a short-let stay when they first arrive while they get settled. An example of the type of tenant we host is that the house was rented out for the whole month of February to an international acrobatic troupe brought in by the City to participate in the Perth Festival. One would think that a “community minded” street would welcome such tenants, displaying the heritage of the street and the community values they espouse, whilst enriching themselves in the process by interacting with the myriad cultures and perspectives of people from all corners of the world.</p> <p>Some neighbours have expressed this sentiment to us: our next door neighbour at number 10 has told us that she’s met some very interesting people who have stayed at the house, and also was interested to be able to rent the house herself when her relatives from China come to visit, as it would be so handy to have them right next door. This embodies the cultural heritage of the street as a historical landing place for migrants.</p>
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<ul style="list-style-type: none"> <li>• Parking is an issue on the street and having 6 people stay at any one time may create further parking issues. Vehicles may be parked on verges and over the footpath;</li> <li>• Reliance for on-street car parking for guests of the short term dwelling would have an adverse impact on the amenity of the locality and access to on street parking by the residents;</li> <li>• The guests may park illegally within Moir Street. It will provide pressure on the already limited amount of on-street parking, thereby penalising those residents who have removed on-site parking for heritage reasons;</li> <li>• The property is advertised online with free parking with no mention of the streets parking restrictions or that it only has 1 car parking bay onsite. With accommodation of 6 guests, it's conceivable some will have more than 1 car and it doesn't seem that parking permits are being used; and</li> <li>• Parking has become an issue as often there are 5 cars per booking.</li> </ul>	<p>The fears on parking issues are unfounded and not substantiated by actual experience.</p> <p>8 Moir St has one off-street parking bay and we have until recently advised tenants on booking that they should let us know if they needed any extra parking, as we could provide them with a visitors permit to allow an additional car to park on-street. From January to August 2018, when we ceased AirBnB operations, only 5 tenants requested the permit to park a second car.</p> <p>We were recently advised by Vincent parking that we should not use the street parking permits in this way and once the change of use is approved they will in any case no longer be valid. So once we receive the license and are able to operate as AirBnB again, we will no longer offer the additional parking permit option. Instead, we will advise any tenants with an additional car that paid parking is available at Northbridge Central Parking, just 3 minutes walk from the house and at very affordable day rates. This is all detailed in the Parking Management Plan.</p> <p>The vast majority of tenants are families or groups of friends (numbering 4-6 people, often including young children) who rent a standard 6-seater SUV which can be readily parked on the property's off-street parking bay.</p> <p>In regards to the assertion that sometimes there are 5 cars per booking, this allegation is completely unsubstantiated. To our knowledge, no tenants have ever had more than two cars, and the vast majority (95%) have just one.</p> <p>It should be noted that when the property was rented out long-term and there were three independent adults living in the house, there were ALWAYS at least two cars belonging to the house and often additional cars from visiting partners/friends. The move to short term rental has therefore significantly reduced the parking pressure on the street associated with the property.</p> <p>Our position is therefore that operating as a short-term dwelling actually IMPROVES the parking situation and this is proven by the experience in the</p>

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	<p>first half of 2018. The comments received from neighbours are not substantiated and speculate negatively with no basis.</p>
<ul style="list-style-type: none"> <li>• The proposed use has the potential to adversely affect the amenity of the area as a result of excessive noise, caused by guests at the premises or going to and from the premises;</li> <li>• The existing short term dwelling is having a negative impact on the community of Moir and Brookman Streets which is a quiet residential area;</li> <li>• As a short term dwelling, the increase in late night noise as well as uber and taxi drop-offs can be heard by the surrounding property owners;</li> <li>• The street is very quiet and the short term dwelling may accommodate several different groups over a week that may invite parties. We have encountered several occasions where party noise has continued until 3.30am;</li> <li>• The driveway cannot accommodate a large vehicle and blocks up the footpath;</li> <li>• Check in time is 2pm-midnight and there is no one present to hand over keys which creates disturbance and noise during the night;</li> <li>• The community spirit will be compromised and the sense of community will be disrupted by short term dwelling occupiers;</li> <li>• Cracks are appearing in the driveways and kerbside nearing No. 8 Moir Street as vehicles coming in are sometimes vans/mini bus/4wd's to accommodate the people staying at the site. These cracks have impact on the heritage values of the street that</li> </ul>	<p>We acknowledge that it is not possible for us to fully control tenants and that some undesirable behaviours, noise in particular, may occur from time to time. However, we have progressively implemented management processes to mitigate these issues and deal with incidences rapidly on the rare occasions when they do occur.</p> <p>It should also be noted that noise and other anti-social behaviours are not limited to short-term tenants. Owner-occupiers and long-term rental tenants can also engage in anti-social behaviour, and unlike the case with short-term tenants who can be evicted and fined in very short timeframes, there is very little that can be done about a problematic long-term neighbour. The received comments imply that the street is currently a utopia with all neighbours living together in peaceful harmony...this is very much NOT the case and as a long-term owner of the property who resided there myself for many years during the 2000s, I can attest to incidents of vandalism between antagonistic neighbours, neighbouring tenants that played loud music at all hours of the night, and police being called for incidents of domestic violence. Neighbours often come home themselves late at night or have friends leave after dinner and movie and stand in the street talking, well past midnight. The onus on us as managers of a short-term dwelling is therefore to <i>manage</i> and <i>minimise</i> antisocial incidents, but not to guarantee a utopian perfection that doesn't currently exist in the long-term dwellings.</p> <p>The Management Plan provides full detail of the measures we will take to minimise disturbance to neighbours. These include:</p> <ol style="list-style-type: none"> <li>1. Clear messaging on all publicity for the property, and further reinforced when bookings are made, that partying and late night noise are <b><i>strictly prohibited</i></b>. And that only registered tenants, up to a limit of 6, may stay at the house.</li> <li>2. Tenants have a bond deposited, and are informed that any violation of the noise and other house rules will result in an immediate fine being</li> </ol>

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<p>everyone in the street has worked so hard to maintain to ensure we continue to be award winning internationally;</p> <ul style="list-style-type: none"> <li>• There has been an excessive amount of noise as many people use it as a party house. We live on a residential street and would like to be respected to have that comfort of our own house to use without having to worry about noise levels from parties all the time;</li> <li>• With a residential street, you are able to recognise neighbours and the coming and going of residents. However with short term stay, it is difficult to see if someone is breaking and entering the house as you can not recognise them. Northbridge already has a high crime rate and often the residents are on the lookout for each other to ensure that homeless and other strangers do not trespass into the properties;</li> <li>• There are many young children on the street and we have seen the short term stay people drive down the one-way street in an incorrect direction and many speed because they do not realise it is a residential street; and</li> <li>• Short term tenancies are well known for their unneighbourly behaviour and already before this proposal has been considered for approval, there have been incidents. We feel that it is unfair for people in the street to have to put up with this anti-social behaviour.</li> </ul>	<p>imposed, and if the issue is severe, their stay will be terminated with 24 hours notice.</p> <ol style="list-style-type: none"> <li>3. These rules are communicated at time of booking, and are also displayed in printed form inside the house.</li> <li>4. All the neighbours have received a letter from us with contact details of the property agent, who may be contacted at any time of the day or night should any incident occur, so that he may react and deal with it immediately.</li> <li>5. Once our license is approved, we will install a noise detection system, such as those provided by NoiseAware (<a href="https://noiseaware.io/features">https://noiseaware.io/features</a>) or Roomonitor (<a href="https://roomonitor.com/product/sound-alarm/">https://roomonitor.com/product/sound-alarm/</a>) that provide instant alerts to us when noise levels exceed pre-set limits. This will enable us to react to most issues even before being alerted by neighbours.</li> <li>6. The experience operating for 8 months has shown that the majority of tenants are families with children, or professionals visiting/arriving in the city for work, and not party goers as claimed by the comments.</li> <li>7. There have been only a very few incidents that were communicated to us by neighbours and these were dealt with immediately upon notification. It is incorrect to imply that noise/party incidents have been a regular occurrence.</li> </ol> <p>In response to some of the other comments:</p> <ul style="list-style-type: none"> <li>• Driving wrong-way down the street - this is a spurious comment. There is no proof that tenants are regularly driving the wrong way down the street. Most tenants use GPS which directs them appropriately. Furthermore, Perth residents frequently drive through the street looking for parking and the occasional person turning into the street the wrong way has ALWAYS occurred. I would observe it on occasion when I lived in the house in the 2000s.</li> <li>• Not recognising people / anti-social behaviour / community spirit compromised - I find these comments to be xenophobic, unfounded and unacceptable. The VAST MAJORITY of tenants are families, professionals or otherwise well-behaved, law-abiding citizens who have family, work or holiday reasons for visiting Perth. Neither Perth as a city, nor the character of the house, are typified by tourism of the “bachelor-party group of drunk hooligans” that these comments imply.</li> </ul>

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	<p>The description, fitout and pricing of the house is very much aimed at the family/professional segment of the market. Furthermore, this total rejection of anyone not living in the street as not part of the community is totally contrary to the ethos of Northbridge and its history as a migrant landing place and current status as tourism and entertainment district. I challenge the residents of the street to be welcoming and inclusive of visitors, rather than hostile, and see how their lives may be enriched by the interactions.</p> <ul style="list-style-type: none"> <li>• Cracks in the paving and kerb. This has nothing to do with the cars parking in the car bay, which are no larger than the cars historically at the house or in other similar bays in the street. The cracks that can be seen are due to subsidence - both neighbours (numbers 6 and 10) have had extensive work done recently to deal with subsidence, and I also have had to repaint to cover large cracks in interior walls, and have a plumber reconnect drainpipes that had disconnected due to movement. Once can see the significant subsidence in the paving stones of my driveway.</li> </ul>
<ul style="list-style-type: none"> <li>• How does the online agent know that there are no more than 6 occupants or have the ability to control noise and other disturbances when the occupants are there for one night;</li> <li>• Information is required to detail how the managing agent will ensure there will not be an undue impact on long term residents due to a continuing revolving door of occupants;</li> <li>• Does the short term accommodation have emergency plans in place in case of a fire;</li> <li>• The proposal will cause ongoing issues that Council will not be able to effectively monitor. These are related to noise, rubbish collection and parking; and</li> <li>• We feel that there is very little the owner can do to ensure anti-social behaviour does not occur especially living overseas.</li> </ul>	<p>A fully detailed management plan is provided with this license application.</p> <p>The “online agent” is a real person, who lives in Perth and manages around 20 properties. He visits the property at least once a week, and his cleaners come at least immediately following each checkout and sometimes to do additional cleans when people stay more than a few days. If more than 6 tenants were to stay at the property, then a neighbour could notify the agent who could come round immediately to verify, and also the cleaners would see evidence based on the bedding used and rubbish produced.</p> <p>Tenants pay a bond upon booking and are clearly informed that any violation of rules, including excessive noise, number of tenants, damage to the property, undue mess and rubbish, etc will result in immediate fines being deducted from the bond.</p> <p>Should an incident occur and the agent, for whatever reason not be available, the owner’s parents and brother all live in Perth within a 20-minute drive of the</p>



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	<p>property and have historically dealt with any issues that arose when the house was rented long-term.</p> <p>As detailed above, if the short-term dwelling license is granted, we will invest in a noise detection device specifically designed for AirBnB properties that will send immediately email and sms alerts to the property manager and owner should noise exceed pre-set limits. The device also records a permanent log of noise levels, so can be used to identify the exact times that tenants check-in and checkout, go to sleep, etc.</p> <p>The house is wired with two smoke alarms (even though regulations only require one) and has a fire extinguisher and fire blanket. Evacuation instructions are included in the tenant welcome kit, as are emergency contact numbers for fire, police, ambulance, etc. These numbers are also posted on the refrigerator door. The house is a very simple structure, all on ground level with a clear exit at each end, so evacuation is straightforward and obvious. Furthermore, candles, smoking and other naked flames are prohibited and this is clearly notified in the house rules and when booking is confirmed.</p>
<ul style="list-style-type: none"> <li>• The short stay may result in issues with rubbish and bins left on the street;</li> <li>• There is an issue with rubbish disposal. The weekly and fortnightly collections do not appear to meet the requirements of multiple occupancies during the relevant bin collection periods. It's been observed that bins can be left on the footpath for days before collection;</li> <li>• Rubbish bins do not get emptied on the correct days and tend to overflow; and</li> <li>• Due to the large number of people staying and going in the house already, there is a constant overflow to the bins. The recycle bin is used as a normal waste bin. The overflow of the waste spills onto the pedestrian footpath and roadside which disrespects the cleanliness of the heritage precinct that we all wish to upkeep.</li> </ul>	<p>We acknowledge that there were some issues with rubbish management when the agent first took over the property, but these have been dealt with by improving processes and creating checklists and training for new cleaners. Over the last 3-4 months of operation there were no rubbish issues.</p> <p>The procedures that are currently in place are as follows:</p> <ul style="list-style-type: none"> <li>• Tenants are provided with clear instructions on how to dispose of rubbish, and that under no conditions should the outside bins be overfilled or rubbish left in the front yard or on the street. Failure to abide by this requirement can result in a penalty being deducted from the bond.</li> <li>• Additional bins have been purchased and placed in the shed in the rear courtyard. Should tenants or cleaners fill up the front bins before collection day, the extra rubbish is placed in these bins and the property manager will take it away for disposal.</li> <li>• Cleaners are trained in the appropriate rubbish to put in each bin, and have on their task checklist to ensure that the bins, front yard and footpath are clean and tidy.</li> </ul>

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	<ul style="list-style-type: none"><li data-bbox="1122 244 2029 547">• Whereas previously it required to make a different arrangement each week to have the bins put out and brought in depending on whether cleaners were scheduled for that day, and this sometimes resulted in miscommunications that resulted in the bins not being moved appropriately, the current system is that a cleaner who lives nearby is paid a monthly fee to put the bins out the night before collection and bring them in during the day following collection. If she cannot do it for whatever reason then she notifies the agent who organises someone else to do it. This arrangement has completely solved the problem and now the bins are always moved according to council requirements.</li></ul> <p data-bbox="1122 584 2029 727">It took some months of operation to understand the different volumes of rubbish that could be generated and to trial different arrangements for putting out and bringing in the bins. But the above described measures worked very well during our final months of operation and there should be no future incidents related to rubbish.</p>