

Summary of Submissions:

The tables below summarise the comments received during the advertising period of the proposal, together with the Administration's response to each comment.

Comments Received in Objection:	Administration Comment:
<p><u>General</u></p> <ul style="list-style-type: none"> Concerns about the use of housing to provide short-term accommodation in the current housing crisis. Concerns about the short-term accommodation resulting in the existing predominantly residential area, with limited commercial/mixed-use properties, becoming semi-commercial. Concerns regarding the precedent that this application would have in the immediate area for other short-term accommodation, leading to an increase in short-stay accommodation in the neighbourhood. Particularly due to its close location to nearby tourist attractions and commercial precincts. Concerns relate to the increased turnover of occupants straining local infrastructure and services, including waste management, parking, and public transport systems. 	<ul style="list-style-type: none"> Administration acknowledges the broader community concern regarding housing availability. However, the planning framework requires that each application is assessed on its individual merits and in accordance with the relevant legislation and planning policies. <p>In this instance, the proposed use for short-term accommodation must be considered as submitted. The potential for the site to be used for an alternative purpose, such as permanent residential housing, is not a relevant planning consideration under Clause 67 of the Planning Regulations.</p> <ul style="list-style-type: none"> Holiday Houses can be expected to be used more intensely than standard dwellings and are best considered as a commercial land use. The Holiday House land use is not supported in this location because it is introducing a noise generating land use in a residential area, which would adversely impact the amenity of the locality. Administration acknowledges concerns regarding the potential cumulative impact of short-term accommodation in the area. However, all development applications are assessed on a case-by-case basis, with consideration given to the specific context of each proposal, including its location, scale, and potential impact on the surrounding area. <p>The approval of one application does not establish a precedent, as any future proposals would be subject to assessment against the relevant planning framework and policies in place at the time of lodgement.</p> <ul style="list-style-type: none"> The proposal meets specific technical requirements, including the provision of two on-site parking bays in accordance with the Short-Term Accommodation Policy, and waste management arrangements comparable to a standard residential dwelling. If the application were approved, guests would be responsible for bin placement and collection as outlined in the applicant's Management Plan. <p>However, while these aspects of the proposal are supported, the City maintains concerns regarding the potential amenity impacts on neighbouring properties. In particular, the frequency of guest turnover may lead to increased vehicle movements and greater use of the site's outdoor areas. The location of parking and associated comings and goings may contribute to noise and disturbance that would not typically be expected from a permanent residence. These impacts are discussed in further detail in the Comments section this report.</p>

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<ul style="list-style-type: none"> • Concerns relate to property values decreasing due to the presence of a short term accommodation property. • The proposal does not meet the Residential Zone objectives relating to the provision a range of housing that meet the needs of the community and providing of a wide range of different types of residential accommodation that meets the needs of the community. This is evidenced by the community opposition to the proposal. 	<ul style="list-style-type: none"> • Property values are not a valid planning consideration identified under Clause 67 of the Planning Regulations. • The application proposes to retain the existing dwelling but introduce a temporary form of accommodation rather than a permanent residential use. This results in a more intensive use of the site due to the higher turnover of occupants and increased activity typically associated with short-term stays. • While the dwelling itself remains residential in form, the nature of the Holiday House land use introduces a level of intensity and transience that is not consistent with the objectives of the Residential Zone. In particular, the use is considered incompatible with the established residential character of the area, with potential for undue amenity impacts, especially in relation to noise and activity from guests. • Community submissions are a relevant consideration in the assessment process, particularly where they raise valid planning concerns. However, the number of submissions alone is not a determining factor in the outcome of the application. The planning framework requires that proposals be assessed on their individual merits and the potential impacts on the locality.
<p><u>Management of the Property</u></p> <ul style="list-style-type: none"> • A lack of information within the Management Plan on how affected neighbours can contact the hosts regarding noise and other socially disruptive issues. • Concerns regarding the operator of the site being off site, which may lead to insufficient attention or action to mitigate issues should they arise. 	<ul style="list-style-type: none"> • The management plan includes the contact details of the proposed management company for the property. If the application were approved, a condition of approval could be applied requiring the Holiday House to operate in accordance with the management plan and for it to be distributed to adjoining and adjacent properties. • While the applicant has provided a management plan and code of conduct to guide guest behaviour, Administration is not satisfied that these measures alone would be sufficient to ensure the protection of residential amenity in this context. <p>The effective management of short-term accommodation within a residential setting is not solely reliant on operational measures, but also on the suitability of the dwelling layout, proximity to neighbouring properties, and the site's overall context. In this case, the absence of on-site management heightens the risk of amenity impacts, particularly in relation to noise, parking, and guest behaviour, which may not be addressed in a timely or effective manner.</p>

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<p data-bbox="125 212 367 236"><u>Noise and Amenity</u></p> <ul data-bbox="125 276 1025 1106" style="list-style-type: none"><li data-bbox="125 276 1025 363">• Concerns relate to increased noise levels anti-social behaviour and disturbances associated with short-stay guests, impacting the quality of life for permanent residents. <li data-bbox="125 647 1025 703">• Concerns relate to the noise impact, caused by the short-term tenants, will cause to adjoining and adjacent residents, particularly at night. <li data-bbox="125 1018 1025 1106">• Concerns relate to the turnover of short-stay guests impacting the relationship within the community, leading to a less engaged community.	<ul data-bbox="1048 276 2101 395" style="list-style-type: none"><li data-bbox="1048 276 2101 395">• The outdoor living area of the subject site is directly adjacent to the outdoor living areas of the neighbouring properties at 18 and 22 Grosvenor Road. Given this proximity, the proposed use of the site as a Holiday House is likely to result in undue amenity impacts, particularly from noise generated by guests. <p data-bbox="1104 427 2112 611">Short-stay guests are likely to use the outdoor living area more intensively, for longer periods, and at less predictable times than typical permanent residents. This pattern of use would have an adverse impact on the adjoining properties, disrupting the residential amenity expected in this location. The layout of the site and its relationship to neighbouring dwellings increases the likelihood of conflict, which cannot be fully mitigated through management measures alone.</p> <ul data-bbox="1048 647 2074 762" style="list-style-type: none"><li data-bbox="1048 647 2074 762">• The applicant has advised that noise monitoring devices would be installed, which would activate once a pre-set noise threshold is exceeded. These devices are intended to notify the off-site management company if elevated noise levels are detected. <p data-bbox="1104 799 2112 983">While this represents an attempt to manage guest behaviour, the measure is reactive in nature and would not prevent the occurrence of noise or nuisance in real time. As there is no host or operator present on-site, any response to issues may be delayed and therefore not effective in mitigating impacts as they arise. This is of particular concern in a residential setting where noise generated during night-time hours can significantly affect the amenity and quiet enjoyment of neighbouring properties.</p> <ul data-bbox="1048 1018 2096 1137" style="list-style-type: none"><li data-bbox="1048 1018 2096 1137">• Administration have considered the potential social impacts of the proposal in accordance with Clause 67(m) of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>, which requires consideration of the social impacts of a development. <p data-bbox="1104 1174 2101 1350">In this instance, it is acknowledged that a frequent turnover of short-stay guests may affect the sense of community and neighbour familiarity within a predominantly permanent residential area. While social cohesion is not a standalone planning objective, the broader social implications – such as impacts on neighbourhood character and residential amenity – have been taken into account as part of the overall assessment of the proposal.</p>

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<ul style="list-style-type: none">• Concerns relate to decreased sense of safety due to guests accessing the property throughout the year.• Concern regarding guests not following the parking requirements.• Concerns regarding the potential noise from dogs if the property is pet friendly.	<ul style="list-style-type: none">• If approved, guests would be required to comply with all relevant laws and the approved management plan, including respecting neighbouring properties. Matters relating to unlawful behaviour fall outside the scope of planning controls and should be referred to the police or appropriate authority if they arise.• The proposal includes the provision of two on-site car parking bays, which meets the requirements of the City's Short-Term Accommodation Policy. While the application meets the technical parking standard, concerns regarding guest behaviour and the potential for overflow parking or non-compliance have been noted.• The applicant's management plan confirms that pets are not permitted on the premises. This restriction would form part of the operational requirements of the short-term accommodation use, should the application be approved.