

This submission is in regards to holiday lettings in Jindabyne NSW, postcode 2627 not the postcode where our office is located.

We book a lot of holiday apartments at & near the snow.

I am strongly in favour of the overall plans to allow short term rental accommodation BUT severely object to the proposed limit of 2 people per bedroom in cases where higher limits are already allowed for DA approved holiday apartments.

This seemingly minor condition (max 2 per bedroom) appears to have been sneaked in on the sly and with little thought applied at all. Such an added restriction would DECIMATE the existing (already DA certified) holiday accommodation market in Jindabyne.

At present Jindabyne Holiday approved apartments are allowed MORE beds than this. The current bed limits were imposed about 15 years ago and at the time were very controversial – holidaymakers were mostly appalled at the limits imposed back in 2003. The vast majority of holidaymakers want accommodation near the snow to be as cheap as possible. The public WANT the option to have at the bare minimum:

- 10 people in a 4 bedroom unit
- 8 people in a 3 bedroom unit (eg: 2+2+4)
- 6 people sleep in a 2 bedroom unit (eg: 2+4 in 2 bedrooms)
- 4 people in a 1 bedroom (2+2 in sofa bed)
- 3 in a studio (tribunk).
- Etc

The proposed 2 person limit appears to have been added on a whim (very sloppy policy drafting). It makes no consideration for different areas, no consideration for existing holiday accommodation. Even more shockingly it makes no reference or consideration at all to:

- studio apartments
- apartments with loft(s) that exist purely for sleeping
- no thought at all given to fold out sofa beds often found in living rooms

When the local council imposed the present restrictions on holiday apartments back in (I think 2003) they introduced a formula based on the square meters of each bedroom. Back then it was considered poor policy within the industry as the local Government policy drafters didn't survey a single tourist accommodation business, and more shockingly they did not even ask a single holiday maker to ask what THEY want before imposing the rules. They arrogantly decided they knew what the public wanted and were 100% wrong. I was trying to tell them over the phone but they insisted they knew what was best for people despite admitting they had personally never needed such accommodation for their own personal or family holidays!!

Whilst there is certainly a market at the snow for people prepared to pay the high cost of max 2 per bedroom, the vast majority of people want a higher density than this in Jindabyne and nearby areas. The present system is already strict (It allows beds per bedroom based on a formula), but 2 beds per bedroom will make a Jindabyne snow holiday prohibitively expensive for the vast majority of holiday makers. It will also decimate the value of existing holiday-DA approved apartments by limiting their beds far more than under their existing approved numbers.

There is no point in adding such a restriction knee-jerk state-wide! The local community is not opposed to the present bed limits (which are more generous than 2 per bedroom).

It is ironic that the new policy proposes to allow MORE short term accommodation (and more competition) but it conversely imposes a NEW SEVERE limit of ONLY 2 beds per bedroom. So in Jindabyne and surrounding areas used for budget snow accommodation it will have the opposite effect!! This 2 bed limit will perversely reduce the beds allowed in existing holiday-DA-approved apartments in Jindabyne. It is ironic as it will allow more properties to accept short term bookings BUT restrict those that have existing DA approvals.

FIRE SAFETY? Note that its absurd to suggest there are fire safety reasons for max 2 per bedroom – there is no basis for this. The more in a bedroom the more people can wake up and alert others and escape. Having 4 people in a sizeable bedroom does not add any fire safety risk at all, in fact it lowers it. You'd have to really CRAM in beds so much as to prevent the bedroom door being opened properly in order to lower fire safety. Only 2 per room is a massive overkill in that regard and gives no consideration for how large a bedroom is. Limiting bed numbers in regards to fire safety stemmed from the Childers backpackers fire where many people died. But in the Childers fire it was a case of a dozen or more beds crammed into rooms where bunks were blocking the fire escape; notably it was also an old wooden building with illegally poor fire safety systems. It is crazy to limit beds to only 2 per bedroom based on any supposed fire safety concerns. Maximum only 2 per bedroom is a massive overkill in regards to trying to assert fire safety as an issue.

I realise that 2 per bedroom may be a good idea in essentially residential areas where overcrowding is not desired by residents, but in Jindabyne we have an existing tourist town where there are already DA approved holiday apartments – these should not be restricted beyond present bed limits by this policy.

As a seller of holiday accommodation at he snow I can expertly assert that most people who go to the snow do NOT want such an extreme limit as 2 beds per bedroom imposed on them – regulations are already in place in regards to bed numbers and new lower limits should not be imposed here.