

The Secretary Legislative Council Select Committee
Short Stay Accommodation in Tasmania
Parliament of Tasmania
Parliament House
HOBART TAS 7000

16 July 2018

Dear Madam/Sir

We would like to make a submission on the impact of short stay accommodation on the tourism sector and specifically the effect of the growth in unregulated areas such as Airbnb and Stayz on accommodation options for people with disability.

We note the Tasmanian Government introduced a policy that would allow people making rooms available in their homes through organisations like Airbnb and Stayz to make up to 4 rooms available without the need for a permit.

Under the *Disability (Access to Premises – buildings) Standards 2010* (Premises Standards) facilities offering short term holiday type accommodation where 4 or more rooms were being made available would be classified as *Specified Class 1b* buildings.

Specified Class 1b buildings are required to offer at least one accessible room with associated accessible sanitary facilities as well as access to any other rooms or spaces made available for use in common by all occupants.

Under the Premises Standards a single dwelling rented out for short-term accommodation or one providing up to three rooms in a B&B or guesthouse-type setting would not be covered by the requirement to provide access as they fall outside the definition of *Specified Class 1b* buildings.

The trigger for access requirements in the Premises Standards of 4 or more rooms was determined to be reasonable because an accommodation service with 4 or more rooms was considered to be a significant financial enterprise that warranted access obligations.

We are concerned that allowing Airbnb and Stayz type operators to provide up to 4 rooms without any need for a permit and with no

obligations to provide accessible facilities is fundamentally inconsistent with the obligations on accommodation service providers under the Premises Standards.

It will result in more short-stay or holiday accommodation options being available to the general public, but not being available to people with disability. Given these are often more affordable options than full-service hotel or motel accommodation, the exclusion of people who require accessible facilities is of significant concern to us.

Yours sincerely

Michael Small
Michael@smallconsulting.com.au

David Cawthorn
dcawthorn@bigpond.com

574 Nelson Road
Mt Nelson
Hobart
Tas 7007