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Short Stay Accommodation Register

30 October 2026

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Australia

Executive summary

Short stay accommodation (SSA) has become an established and growing part of South Australia's accommodation landscape, delivering significant tourism, economic and visitor benefits across metropolitan, regional and coastal communities. However, the rapid growth of the sector has also highlighted the need for greater transparency and a clearer understanding of its scale, distribution and operation.

For local government, the proposed mandatory SSA Register presents an opportunity to establish a reliable evidence base, improve visibility of the sector, and support more informed decision-making by governments, communities and industry.

A comprehensive and accurate register is critical to ensuring future policy responses are grounded in evidence rather than perception.

LGA broadly supports the intent of the Short Stay Accommodation Register - Discussion Paper¹(the discussion paper) and recognises the value of a statewide registration framework. A mandatory register has the potential to improve transparency, strengthen public confidence in the sector and provide government with the information necessary to monitor emerging trends and assess policy outcomes.

Importantly, the register should be designed to complement existing regulatory systems, minimise unnecessary administrative burden and deliver a practical, user-friendly framework that balances the interests of operators, local communities and government.

The success of the register will therefore depend on clearly defined roles, appropriate legislative authority and sustainable funding arrangements.

LGA's positions on the proposed framework in the discussion paper are:

- LGA supports a publicly accessible, mandatory register that is an online and self-compliance model similar to the registers used in NSW and WA² that lessens the administrative burden on all the parties involved.
- LGA *does not* support transferring registration and renewal responsibilities to councils as outlined in the discussion paper. Consulted industries are of the same view as LGA.
- LGA supports the creation of a separate SSA land use category, recognising that SSA is not always clearly distinguished within existing land use definitions. However, support for a new category is contingent on:

¹ https://yoursay.sa.gov.au/download_file/4885/2087

² [Short-Term Rental Accommodation registration data](#)

- having no planning or compliance implications on councils, or
- the planning system, including the Planning and Design Code, being appropriately amended to accommodate them.
- LGA supports the introduction of a Code of Conduct to promote consistent standards, clarify responsibilities and provide a framework for addressing common community concerns.
- LGA supports strong and credible enforcement, but responsibilities must be clear and supported by legislation.
- LGA *does not* support councils becoming the default enforcement agency for enforcing the code of conduct for activities that are not traditionally their responsibility, such as enforcing guest behaviour and anti-social conduct.
- LGA supports councils setting annual fees within a Minister-determined range (similar to Dogs and Cats Online³ – a statewide platform for animal registrations), particularly to help regional councils recover growing compliance and enforcement costs associated with short-stay accommodation.

With these foundations in place, the register can deliver greater transparency and support effective regulation of the sector. This will help ensure SSA continues to benefit visitors, operators and local communities while maintaining confidence in the broader accommodation market.

Recommendations

Based on the above outlined local government concerns, LGA recommends the following:

1. Simple, clear and consistent definitions for the following accommodation typologies and stay timing:
 - a. hosted and non-hosted accommodation
 - b. entire dwelling, individual room rentals and ancillary accommodation
 - c. occasional use and commercial-scale operations
 - d. number of days for SSA.
2. That a state body administers the register and renewals and provides access to councils on the data they need for local planning, compliance and policy functions.
3. The register operates through a digital self-registration and self-compliance model that minimises administrative burden on councils, operators and government.

³ [Dogs and Cats Online](#)

4. Councils be provided timely access to relevant register information to support planning, policy, compliance and rating functions.
5. New state-wide legislation, similar to WA,⁴ to include Code of Conduct, transitional arrangements, compliance and enforcement mechanisms. LGA heard from members and industries that WA is the best model to adapt for South Australia.
6. The Code of Conduct to address key issues including noise, guest behaviour, property maintenance, parking, waste management, neighbourhood amenity, complaints, emergency management, occupancy limits, pets, and the responsibilities of booking platforms, hosts and property managers.
7. A minimum of 12-month transition period be adopted that includes education-focused compliance during implementation, and staged registration requirements.
8. The introduction of legislation to clarify responsibilities of the state government agency administering the register, councils, and other relevant organisations and industries.
9. That councils not be burdened for compliance and enforcement functions without accompanying resources and legislative authority. LGA proposes a funding model similar to Dogs and Cats Online of split of 88% for compliance and enforcement and 12% for state administration.
10. The inclusion of significant penalty provisions, similar to WA (e.g. \$10,000 for operators and \$100,000 to the hosting platforms), to deter non-compliance and encourage registration and renewal obligations to be met. Greater penalties should be included for repeated non-compliance.
11. That there is an urgent need for further research into the relationship between SSA, housing availability, rental affordability and tourism outcomes before additional intervention measures are introduced. This is particularly important given that perceptions of SSA impacts are increasingly influencing local policy decision-making, despite a limited evidence base.

⁴ [Short-Term Rental Accommodation Act 2024 - \[00-00-00\].pdf](#)

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About us

At LGA South Australia our purpose is to help local government build stronger communities.

As the peak body proudly representing 68 councils across South Australia and the Anangu Pitjantjatjara Yankunytjatjara, we champion the needs of our members every single day.

Working for our members, we represent the interests of local government at both state and federal levels and provide robust and innovative solutions to local challenges.

Whether it's policy development, coordination on important issues or training and development, our work is about empowering local government to deliver a real, lasting impact for South Australians. Our trusted services also include tailored cover and risk services for the sector, and access to pre-qualified suppliers and panels to save councils time and money.

With a focus on leadership and representation, our work is driven by a shared passion for making a difference in the lives of the communities.

LGA welcomes the opportunity to provide a submission on Short Stay Accommodation Register Inquiry by Consumer and Business Services (CBS). Working together we can make positive contributions to the short stay accommodation, housing market, and tourism industry for South Australians.

LGA consulted extensively with councils, the Rating Officers Group, regional local government associations, assessment managers and finance managers to inform this submission. The submission has also been informed by stakeholder engagement with relevant industry representatives.

Background

Short stay accommodation (SSA) has become an increasingly important component of South Australia's visitor accommodation sector, providing additional accommodation capacity for tourists, supporting regional visitation and creating opportunities for property owners to participate in the visitor economy. In many cases, it also provides a funding mechanism for South Australian's holiday homes.

Local government has a direct interest in the regulation of SSA and we welcome the opportunity to have input into this review. Councils are frequently the first point of contact for residents seeking assistance with issues associated with SSA, including noise, parking, waste management, property maintenance and neighbourhood amenity concerns. Councils also have responsibilities relating to planning, local nuisance management, community

engagement and economic development, all of which may be influenced by the operation of SSA.

In 2025, LGA made a submission⁵ to the Select Committee of the Legislative Council (the Committee) on the inquiry of the SSA sector in South Australia⁶. As part of the submission, LGA recommended a statewide consistent SSA register and code of conduct. The submission also included the importance of ensuring that any regulatory framework is evidence based, proportionate to risk and supported by clear governance arrangements.

Following the inquiry, the Committee released the report⁷ that included recommendations summarised as below:

- **Registration scheme:** The state should set up a mandatory short stay register, with data reported by both operators and booking platforms and shared regularly with councils to inform planning and rating. It could also cover a code of conduct, safety standards, planning compliance, and disability access disclosure.
- **Fee or levy:** Owners should pay a registration fee or levy, set by the state, taking into account cost recovery, compliance costs, reinvestment in affected communities, differential rates (by occupancy or multiple properties), and a possible fee on booking platforms.
- **Process:** The state should learn from other jurisdictions, especially on data-gathering challenges, and consult the sector and affected stakeholders.

This submission responds to the Inquiry on Short Stay Accommodation Register⁸ drawing on the consultation with our members and considering regulatory approaches in other Australian jurisdictions. The Short Stay Accommodation Register - discussion paper (the discussion paper)⁹ for this inquiry proposes the establishment of a SSA register and associated regulatory measures, including the potential introduction of a Code of Conduct and compliance framework.

⁵ [ECM_839970_v14_Submission to the Select Committee on the Short Stay Accommodation Sector](#)

⁶ [SUBMISSIONS OPEN: Select Committee on Short Stay Accommodation Sector](#)

⁷ [CommitteesUi](#)

⁸ [Short Stay Accommodation Register | YourSAy](#)

⁹ https://yoursay.sa.gov.au/download_file/4885/2087

Submission report

Public availability and mandatory register

LGA recommends a similar model to Western Australia's (WA) dashboard¹⁰ of publicly accessible and mandatory register.

Public register improves consumer confidence and accountability, allows councils, communities, booking platforms and visitors to verify registration status, and support compliance activity. It would also improve understanding of the scale, distribution and impact of SSA across South Australia.

Register content and privacy

A public register could show the property location, registration number and status, accommodation type, maximum guest capacity, hosted or non-hosted status, and whether relevant compliance requirements have been met.

Personal information about owners and hosts should not be publicly searchable, and the extent of disclosure should be tested against privacy obligations.

Aggregate information of this kind would be useful to prospective operators and local chambers of commerce - consistent with the discussion paper's statement that the register is a verification tool and not a commercial directory.

Compliance and exclusion mechanisms

LGA supports a public exclusion mechanism for operators subject to serious or repeated non-compliance, as a complement to the registration system.

An exclusion register can strengthen compliance, provide greater transparency for consumers and booking platforms, and reinforce confidence in the integrity of the regulatory framework. The exclusion register operating under NSW's Code of Conduct provides a useful example of this approach.¹¹

Definition of SSA

LGA supports simple, clear and consistent definition for the following accommodation typologies and stay timing:

- hosted and non-hosted accommodation

¹⁰ [From the Commissioner: Want to know about holiday homes in your area? - Consumer Protection - LGIRS](#)

¹¹ [Code of conduct for the short-term rental accommodation industry | NSW Government](#)

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- entire dwelling, individual room rentals and ancillary accommodation
- occasional use and commercial-scale operations
- number of days for SSA.

A consistent definition and set of criteria is critical for reliable data collection, compliance activity, rating decisions and evidence-based policy.

Self-compliance design

SSA is a dynamic market in which investors frequently move properties between long-term and short stay use. The definition and the registration system need to accommodate this, which requires an online model that makes both registering and deregistering easy.

LGA proposes an online, self-compliance model of the kind used in NSW and WA. In NSW, a registration that is not renewed by its expiry date is marked 'blocked' and cannot accept bookings from online booking platforms. It is held for a further three months before being automatically de-registered.¹² This mechanism enforces renewal without requiring additional resources.

Further detailed registration requirements should be developed in consultation with councils and industry stakeholders.

Registration requirements

In addition to the registration requirements outlined in the discussion paper, the registration framework should be designed to minimise unnecessary administrative burden on councils for compliance and for small-scale and occasional operators in registering their properties.

A study of day-cap regulations (maximum number of days legislated for SSA) across cities found that registration requirements reduced smaller, non-targeted hosts participation by 26% and 52% - suggesting that registration and compliance requirements can create administrative burdens that discourage participation.¹³

To avoid unintended consequences, LGA recommends that:

- existing government-held information be used wherever possible to minimise duplication
- compliance obligations remain proportionate to risk
- registration and deregistration processes be simple and accessible

¹² [Short-term rental accommodation | Planning](#)

¹³ [Regulating the sharing economy: The effects of day caps on short- and long-term rental markets and stakeholder outcomes | Journal of the Academy of Marketing Science | Springer Nature Link](#)

Role of councils in registration

LGA does not support transferring registration and renewal responsibilities to councils.

Feedback from industry stakeholders also indicates a preference for a consistent, statewide approach to the registration and renewal of SSA.

Local government concerns

LGA's primary concerns about councils taking on registration relate to the potential creation of an unfunded regulatory responsibility (cost shifting), increased administrative workload, and compliance and enforcement expectations without adequate resourcing.

There is also a risk of duplication of state and local government functions, and the delineation of responsibilities between councils and Consumer and Business Services is unclear.

A key concern is liability. Placing responsibility for SSA registration and administration on councils could expose them to legal, financial and reputational risks arising from registration errors, omissions or compliance issues. The primary obligation to register should remain with property owners.

Relation to Red Tape Review

LGA also notes that the Product Commission in SA is currently pursuing initiatives to reduce unnecessary regulatory burden and red tape across government.

In this context, any proposed registration model should demonstrate a clear policy rationale, avoid duplication of existing functions, and be supported by evidence that the benefits outweigh the administrative costs.

State administered register

Registration and renewal may be more appropriately managed through a centralised state-administered system, with councils given access to the data they need for local planning, compliance and policy functions. For example, in NSW and WA, the register is administered at state level.

LGA proposes that a state body administer the register and renewals, for example, the Valuer-General, Land Services SA, Consumer and Business Services or the Department for Housing and Urban Development, under a self-compliance model of the kind used in WA and NSW.

Dogs and Cats Online

LGA recommends a similar model to Dogs and Cats Online that is administered by the Dog and Cat Management Board (Department for Environment and Water), where the primary responsibility for registration, renewal and updating information rests with the property owner.

Councils should have access to the register for information and compliance purposes, without being responsible for administering registrations on behalf of operators.

LGA proposes a funding model similar to Dogs and Cats Online of split of 88% of registration fees for compliance and enforcement and 12% for state administration.

A fee-sharing approach would provide a transparent and sustainable mechanism to support both the ongoing administration of the registration system and the costs associated with its implementation and oversight.

Resourcing for the register

Further, LGA recommends that state administration must be adequately resourced for statewide registration. NSW has experienced resourcing pressure in its compliance model.

The City of Sydney has told the NSW Government that enforcement is hampered by inaccurate and unavailable data on the state register and has called for properly resourcing the Office of Fair Trading to monitor and enforce the scheme.^{14 15}

South Australia should learn from this by appropriately resourcing the state register from the outset.

Proposed new land use category

Learnings from Queensland

The discussion paper also proposes a separate land use category for SSA in the *Local Government (General) Regulations 2013*. LGA recommends that the CBS examine the Queensland experience before finalising this.

¹⁴ [Decision - Motion to Local Government NSW Annual Conference - Houses for Homes \(Short-Term Rental\) | City of Sydney](#)

¹⁵ [Decision - Banning Short-Term Rentals in the City of Sydney During the Housing Crisis | City of Sydney](#)

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SSA is a land use under the *Queensland Planning Act 2016*, and each council regulates it through its own planning scheme and local laws.¹⁶ The Queensland Government has reaffirmed that councils are best placed to undertake this regulation.¹⁷

The result is variation between councils - in how existing use rights are applied to established short stay properties, and councils such as Noosa Council have developed their own local by-law and registration fee.¹⁸

This experience suggests that a land use category which relies on each council's own scheme and local by-laws produces inconsistent outcomes, and that any new category should be accompanied by consistent statewide settings.

Planning Implications

In principle, LGA supports the creation of a separate SSA land use category, recognising that SSA is not always clearly distinguished within existing land use definitions.

However, support for a new category is contingent on:

- having no planning and compliance implications on councils, or
- the planning system, including the Planning and Design Code, being appropriately amended to accommodate them.

Hosted accommodation generally retains the characteristics of a residential dwelling, whereas non-hosted accommodation may have land use impacts more akin to visitor or tourist accommodation.

The treatment of SSA, and therefore its definition, will need to differentiate between hosted or non-hosted status and the number of nights offered. For example, the SA Planning system recognises SSA as both tourist (i.e., non-hosted) and ancillary dwelling (i.e. hosted).

For this reason, SSA, both hosted and non-hosted, will need to be defined in the planning system, with appropriate policies to facilitate development approvals, before the new land use category is introduced.

If planning controls are linked to hosted or non-hosted status, or intensity of use, councils should not be expected to determine or audit these matters without clear legislative authority, access to state-held registration data and funding for associated compliance activities.

¹⁶ [SHORT TERM ACCOMMODATION \(STA\) UPDATE FEBRUARY 2026 - Sandy Bolton](#)

¹⁷ [5825t1306.pdf](#)

¹⁸ [Short-Stay Local Law proving effective, with more improvements to come | Noosa Shire Council](#)

Legislative framework

LGA recommends that any registration framework be established through new dedicated statewide legislation, like the *WA Short-Term Rental Accommodation Act 2024*.¹⁹

A standalone Act to provide a clear and consistent legislative basis for the following:

- Registration scheme
- Code of Conduct
- Transitional arrangements
- Roles and responsibilities
- Compliance and enforcement powers
- Penalties
- Data-sharing arrangements

A uniform approach without duplication would reduce regulatory complexity, give clarity to operators working across multiple council areas, and ensure a consistent minimum standard throughout South Australia.

LGA notes that an alternative approach would be to amend existing legislation, such as consumer protection, local government or planning legislation, to establish the registration framework and associated regulatory requirements.

LGA prompts CBS to explore this approach through existing legislation in SA. For example, people noise (SA Police), nuisances (*Local Nuisance and Litter Control Act 2016*), parking (council officer), and where applicable, land use (*Planning and Development Act 2016*).

Code of Conduct

LGA supports a consistent statewide Code of Conduct to promote consistent standards, clarify responsibilities and provide a framework for addressing common community concerns.

The Code should operate as a minimum statewide standard and should not prevent councils from responding to legitimate local planning or environmental circumstances. For example, a coastal holiday settlement, a vineyard property, a city-centre apartment and a dwelling are not identical. Likewise, accommodation located in hazard prone area should be subject to further scrutiny.

¹⁹ [Short-Term Rental Accommodation Act 2024 - \[00-00-00\].pdf](#)

Code of conduct requirements

LGA recommends that the Code address safety requirements, noise management, guest behaviour, property maintenance, parking impacts (especially during peak holiday seasons), waste management requirements, neighbourhood amenity, providing information on any emergency management hazards (e.g. located in a high bushfire risk area) and complaint handling processes.

It should also address emergency management arrangements, maximum occupancy and pets, and the responsibilities of booking platforms, hosts and property managers.

Consequences for repeated non-compliance should be included, such as an exclusion register of the kind used in NSW.²⁰

In addition, the ability of residents and councils to obtain a timely response when problems occur needs to be considered. Therefore, every registered non-hosted SSA property should be required to nominate a responsible person who can be contacted 24 hours a day and who has authority to address the issues listed above. This person and their contact details should be contained in the register.

Interaction with Planning and Design Code

South Australia's planning system operates under a statewide set of digitised planning and design rules. LGA notes that some safety issues associated with SSA, such as bushfire preparedness, flood risk awareness and access to emergency information for visitors, may not be adequately addressed through existing planning and building systems.

Given that visitors may be unfamiliar with local hazards, LGA recommends that the Code of Conduct includes practical safety information on hazard risks, mitigation measures, and evacuation procedures. This includes highlighting the hazard risk, if building/property is hazard safe (bushfire, floods, etc.), and assurance that the owner has taken steps to ensure the risk is minimised (e.g. that a smoke alarm is installed, used noncombustible roofing materials, recommended vegetation clearance distances, finished floor level is above recommended Australian Height Datum (AHD), etc.)

The Code should address identified safety gaps through simple, risk-based requirements that minimise administrative burden while improving visitor safety outcomes. This could include a self-assessment checklist as part of the registration process to support operator awareness and compliance.

²⁰ [Code of conduct for the short-term rental accommodation industry | NSW Government](#)

Periodic review

LGA recommends periodic review of the registration system and Code of Conduct after implementation.

Regular reviews would provide an opportunity to evaluate whether the framework is achieving its intended objectives.

It could also identify any gaps and unintended consequences for councils, property owners, residents and the tourism industry, as mentioned in the Code of Conduct's interaction with planning code above.

Transitional provisions

The discussion paper proposes a transition period of 6 to 12 months. LGA recommends a minimum of 12-month transition period that includes education-focused compliance during implementation, and staged registration requirements.

The transition period should allow for the lack of enabling legislation, lack of awareness of the new requirements, limited understanding of registration processes, and the time required to establish operational systems.

WA's experience shows the value of a staged approach. Its register opened to owners before registration became mandatory on 1 January 2025, and the initial annual fee was waived for owners who registered early.²¹

Capacity constraints for councils, hosts and booking platforms, and the availability of guidance materials and education resources, are further barriers. Clear guidance material is needed for operators and councils, including clear advice on the relationship between the register and existing planning or building approvals.

Compliance and enforcement

LGA supports strong and credible enforcement, but responsibilities must be clear.

The discussion paper proposes that councils manage complaints about alleged breaches of the Code while Consumer and Business Services undertakes compliance activity relating to registration.

²¹ [Short stay register now open for owners - Consumer Protection - LGIRS](#)

Compliance role supported by legislation

LGA recognises local government already undertakes a compliance role as the closest level of government, such as responding to community complaints, investigating alleged breaches of planning approvals and local laws, monitoring amenity impacts.

That role must be supported by legislation that clearly delineates the responsibilities of Consumer and Business Services and councils, adequate resourcing and funding, access to accurate platform and registration data, and consistent enforcement approaches across the State.

It also requires mechanisms to identify non-compliant and unregistered properties, and appropriate review and appeals processes.

Compliance and enforcement responsibility

LGA recommends that councils should not become the default enforcement agency for guest behaviour, anti-social conduct or other matters that appropriately fall within the responsibilities of Consumer and Business Services, SAPOL or other state agencies. Any additional compliance and enforcement functions assigned to councils should be supported by appropriate funding, resourcing and legislative authority.

Councils do not typically undertake compliance and enforcement of behavioural matters within private accommodation settings. Their regulatory functions are generally focused on planning, building, environmental health and nuisance matters, while anti-social behaviour and guest conduct are managed through other regulatory agencies.

Applying a different compliance model to short-stay accommodation would therefore extend local government responsibilities beyond established practice.

Compliance and enforcement cost

LGA recommends the inclusion of significant penalty provisions, similar to WA, to deter non-compliance and encourage registration and renewal obligations to be met.

Penalties should apply to both operators and booking platforms where they facilitate or publish unregistered accommodation. It should also be remitted to the relevant enforcement body, i.e., if councils are responsible for the enforcement through *Local Nuisance and Litter Control Act 2016*, the penalty should be paid to councils.

Any compliance and enforcement responsibilities assigned to councils must be accompanied by appropriate funding, cost-recovery mechanisms and clear statutory powers.

Fees and cost recovery

The discussion paper proposes that councils set and collect annual fees within a range determined by the Minister.

LGA does not support any collection of fees through councils. As previously stated, this is best suited within state administration for consistency.

However, LGA supports the proposal for councils to set annual fees within a range determined by the Minister. This is particularly important for regional councils, where growth in short-stay accommodation has increased compliance and enforcement responsibilities despite limited resources and capacity to undertake these functions.

This approach recognises that the administrative, compliance and enforcement requirements associated with SSA may vary across council areas and provides councils with the flexibility to recover reasonable costs arising from these functions.

Structure of fees and cost recovery

The structure should reflect the actual cost of administration and compliance without imposing disproportionate costs on small-scale operators.

There is a significant difference between a homeowner occasionally making a holiday property available, a hosted bed and breakfast, a farm stay, a small local accommodation operator and a large commercial operator managing multiple properties. A flat fee could have unintended consequences.

LGA recommends a graduated fee structure based on the number of properties operated, the number of nights available, commercial scale, hosted or non-hosted status, and the level of regulatory oversight required.

Differentiation by hosted status already has precedent in Queensland, where Noosa Council's proposed local law would apply registration only to the properties that are let out without an on-site manager.²²

LGA supports the recommendation of Parliamentary Committee that inquired into SSA that any fee should consider cost recovery, compliance costs, differential rates by occupancy and multiple-property ownership, and reinvestment in affected communities.²³

²² [Short-Stay Local Law proving effective, with more improvements to come | Noosa Shire Council](#)

²³ [CommitteesUi](#)

Research into SSA and housing market

LGA has recommended in its earlier submission further research into the relationship between SSA, housing availability, rental affordability and tourism outcomes before additional intervention measures are introduced.²⁴

While concerns have been raised about the impact of SSA on housing supply, the extent of these impacts can vary significantly across South Australia, particularly between metropolitan, regional and tourism-focused communities. As such, policy responses should be informed by robust evidence that clearly identifies the role of SSA relative to other factors influencing housing availability and affordability.

An evidence-based approach will help achieve an appropriate balance between supporting housing outcomes for residents and maintaining the tourism and economic benefits that SSA provides to communities across South Australia and help inform a range of state and local government decision-making.

²⁴ [ECM 839970 v14 Submission to the Select Committee on the Short Stay Accommodation Sector](#)

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