

PERSONALLY, I WOULD FAIL THIS GOVERNMENT EFFORT: KEY COMMENTS ON THE OPTIONS PAPER ON SHORT-TERM HOLIDAY LETTING IN NEW SOUTH WALES (NSW)

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Seek global management approaches to short term and other letting: Everybody learn and everybody teach about key relationship on related ideal and particular grounds

The strata manager referred the government options paper '**Short Term Holiday Letting in NSW**', to the strata committee of strata plan 10775, of which I am a member, living on the plot since 1994. Prior to that I lived in a collectively owned Glebe household since 1974.

As I pointed out first to the strata plan members, and now again more broadly:

'From the perspective of the householder, owner or prospective tenant, occupancy in any place should be as flexibly open to use as possible, as long as any hazards it brings can be appropriately managed to reduce them''. This is not just to house wandering or homeless people better but to benefit the total Australian population which government supposedly represents. This ideally includes key market drivers. One assumes the need for personal choice based on the status quo for related security reasons. Japan should not be forced to take in immigrants; I should not be forced to share my three storey Glebe town-house, etc. However, Australian government is loaded with irrational disincentives it could reverse.

The government discussion of short term holiday letter should focus on potential hazards, which may arise in any form of ownership and occupancy, short or long term, and how to manage them when they do arise, whatever they are. However, this cannot be done in increasingly professionalised isolation, or mandated window locks to stop kids falling from buildings may hinder those escaping them if they burn. Ideal management involves more holistic, global understanding of the place and people in it. Think globally, act locally, etc.

Given that short term letting is also impossible and perhaps dangerous for anyone living on the property to police, the main need is to provide clear avenues for its management in a global economy. I often find it frustratingly hard to understand why so few of these more logical communication avenues appear so unwillingly revealed.

Government terms of reference in regional and historically grounded terms

As a former NSW public servant and teacher in the Faculty of Health Sciences at Sydney University in retirement since 2007, I naturally address the short-term holiday letting inquiry ***term of reference (e) first, rather than last.*** To do the latter would be to apply the normal US market model. This is too narrowly partial, unstable, secret and costly in regard to government representative roles, and also in global terms where business and/or its related

community operations are expected to address wider ranges of opportunity, as well as our local spots. I learned the benefits of the ideal stakeholder management model under the Greiner government and have been grateful for the lessons since. Cop this particular lot.

Term of Reference e. Regulatory issues posed by short-term letting including customer safety, land use planning and neighbourhood amenity, and licensing and taxation.

It is hard to think of who the ideal **customer** is expected to be in many land and construction transactions involving government. However, the Chinese Communist Party appears most concerned about corruption, including data corruption. This is addressed later in reference to the article entitled "China to shed light on shadow banking" in the Australian Financial Review (AFR 7.8.2017). Australians should be equally concerned about corruption, considering the chaos produced by the global financial crisis of 2008 and its roots in US housing. Related data and corruption concerns in regard to the proposed privatization of the Land and Property Information Service (LPIS) in NSW are addressed later and attached.

Concern over corruption often starts naturally with land and construction, as these are the normal motors of history. Consider together their related research and data gathering associations, which archive intellectual property. This is addressed later and attached in regard to the need for better attention to the digitization of local government and related association data to serve whole populations better, including producers. This is the shared regional stakeholder approach to government I learned as a public servant in the 1980s. It is a regional planning and neighbourhood amenity view to improve development and reduce corruption through more helpful consultation and communication than lawyers deliver.

Approach matters with globally related regional place and property based perspectives. This is the manner most appropriate to government and to my status as a land and property owner and investor, as well as a NSW resident and householder. The typical professional family and party blinkers are normally applied more narrowly in theory and in practice, potentially offloading many costs onto others. The NSW Land and Property Information Service is ideally addressed in the state context in which former Premier Greiner produced the *Independent Review of the NSW Regulatory Policy Framework (2017)*, discussed attached.

As I indicated in the attached response to my local state MP, Jamie Parker, about the future of the Land and Property Information Service, I normally start from the position that self-regulation under state guidance is naturally best for data gathering as long as it can be used collectively and openly questioned by anyone to gain a response. This is a commonly expected practice in many Australian health and research services, for example. Wikipedia provides a more rapidly stunning global example of speed and potential for self-improvement in data provision. There are contradictions in the new media however. It must be seen that life is not all up or down.

The government expectations of regional planning, construction and maintenance should not be the normal commercial practice where the shield of the Crown traditionally also protected government operations from suit. This purely commercial approach was overturned in the 1980s, to take on health and insurance data and information gathering roles from broader, more reliable evidence based administrative systems, that courts have never cared about or provided. Matters are ideally

dealt with now from regional and historic place and person based perspectives. Related discussion of regional policy is below and attached. Courts are not designed to provide service. Yet their feudal expectations easily infect and harm all or many at huge environmental, social and economic cost. Hilmer provided a clear and sensible National Competition Policy (1993) which all states accepted. Lawyers and other traditional interests with more feudal expectations began to make it rubbish.

The regional planning view that seeks to obtain more reliable information for better risk management across the economic, social and environmental board requires more openly informed discussion of problems on any particular ground than commonly appears normal.

This is addressed, for example, in regard to managing **hazards of planning and development**, with reference to Strata Plan 10775, composed of 18 town houses and grounds at St. James Court. I live here as a self-funded retiree. This gives me money and free time to make grounded observations about regional service also on behalf of people in NSW and those beyond who may consider coming here for tourism or related development reasons. Nobody pays me for it and neither should they. I write constantly for love alone. Whether what I do is worthwhile is for others to decide. This is the common artist's pursuit which one always seeks to integrate better into normal regional and administrative practice.

Joint development with others working with the Chinese Community Party are addressed later and attached, for example. This is to point out approaches to joint development as common starting points to gain enhanced wellbeing and stability with more diverse opportunity made available for all. Security and development require balanced opportunities. Normal cycles of growth and depression cannot deliver them. Democracy struggles to get beyond feudal, tribal and fascist silencing constraints which have typically ruled strongly in the key producer and family or party associations since 1950. More open integration of a wide variety of contradictory ideals and practices is now sought. This has been the ideal global aim and direction since the Universal Declaration of Human Rights and related United Nations Conventions and instrumentalities were set up after WW2.

The Carriageworks Exhibition, **1917: The Great Strike**, at the former Eveleigh Railway Workshops recently, was highly illuminating, for example. It seemed to show Australia has been a comparatively successful, peaceful, fascist nation for the whole of the 20th century, without anybody much sharing this observation. In a global economy in which China appears as a state planning power, while the US embraces the market with all its ups and downs, why in Christ's name is Malcolm Turnbull still sticking to a view that Australians or anyone else needs the US military alliance, instead of common sense? (Is it his Party?)

From the ideal householder and related neighbourly and professional perspectives, an ideal regional view requires appropriate consultation and action around an arena, not in multiplicities of sheltered tea rooms where they secretly bicker with like-minded mates across the globe or nation. The individual is ideally understood in her regional, historical, context or professional nonsense may result, posing as science in numbers. As wild British colonials, Australians have held advanced social views since Constitutional birth, due partly

to the protection of distance, as distinct from its tyranny. However, the Marxist dialectic seems a good partner to good risk management as it is theoretically well designed to recognise planning contradictions occurring on particular grounds. Consider the strengths, weaknesses, opportunities and threats of operations together more broadly. More Japanese, South Koreans, and their neighbours should see this. (My film is coming!)

As a woman, I start easily with the scientific view that more knowledge on a subject is better than less, including about any beings one is associating with. The more knowledge one has or has access to in every way, the better chance one has to protect oneself. Secrecy is often dumb and expensive even for many common commercial ends. I guess most of us have felt that. Unplanned occupationally driven approaches to production and its state had their day. A woman should not have to depend on a man's casinos if his secretive values revolt her.

Discussion of Potential Options for regulating short term holiday or other letting

Naturally holding further and better quality of life in mind, one addresses **Figure 1: Potential Options in "Short Term Holiday Letting in NSW"** in the above regional context.

One wonders how any of the four regulatory options presented to this community of this state may be expected to be policed by anyone on the strata plan grounds. Any ideas?

Any thought about reasonable land and housing management approaches for householders or housing service providers appears missing from "Short Term Holiday Letting in NSW". How does government expect its following options to be managed to make them work as intended?

1. INDUSTRY SELF REGULATION
2. STRATA REGULATION
3. PLANNING REGULATION
4. REGISTRATION

Real estate agents, strata managers, government housing providers and others relevant to any community matter should be far more widely available. All involved should attempt to respond helpfully to phone calls and emails about perceived problems to deal appropriately, rather than hiding until lawyers drop in or not. This is discussed later.) This is the impeccably neighbourly and professional approach. It needs government back-up.

This paper "**Short Term Holiday Letting in NSW**" and its four potential options appear to be a waste of time in the absence of any account of the grounded conditions and expectations in regard to the exercise of regulatory intent in key places. Related discussions on the strata committee at St James Court and with neighbours are presented later, to illustrate this. City of Sydney and other waste management operations are addressed similarly attached.

The housing service provider and those living on the block are normally most affected by its developments, whether these are advantageous to owners and investors or not.

Key direction about state regulatory and implementation expectations, or about managing housing assets for generally increased wellbeing must be provided from them, according to their particular experience of the particular place, which may vary a lot.

“Short Term Holiday Letting in NSW” operates from the regulator’s perspective, with cavalier disregard for what might then happen in community hands, which may vary a lot.

Without some more broadly practical implementation design for regulations related to living in and managing a place, these 4 regulatory options appear likely to become increasingly costly in ways which also prevent identification of current and new hazards to populations in this state and outsiders. This increases development risk and social instability for the same reasons which brought about the global financial crisis in 2008.

As I indicated before, “From the view of the householder, owner or prospective tenant, the occupancy of any place should be as flexibly open to use as possible, as long as any hazards it brings can be appropriately managed to reduce them”.

I am an owner living on the premises today but who knows what I may want to do with my house in future? We may all be in that state. Similarly, there are homeless people who cannot be housed more effectively as long as all remain ignorant of potential opportunities in housing stock owned by government or in the private sector, which naturally includes the opaquely charitable one. Manage it properly.

The government discussion of short term holiday letting should focus on potential hazards, which may arise in any form of ownership and occupancy, short or long term, and how to manage them when they do arise, whatever they are. It is a confusing example of bureaucratic thrust for the govt. paper not to make clear the potential hazards of the matter being addressed, as these hazards may equally appear in longer forms of occupancy in a place, whether owner occupied or not.

Hazards may not be purely economic or straightforwardly addressed according to rule

The principle aim of strata legislation is to protect the strata building and its residents from hazards.

These are often most commonly seen and characterized, perhaps, as the hazards of the party house. See attached for related discussion of City of Sydney and other waste management in Glebe and beyond. Some common party hazards appear as **noise, damage** (from smokers burning the place down, **clumsy people enjoying themselves and breaking things or falling off balconies**, etc.) and **rubbish** which is left behind. (It is ironic that when I first wrote the above I forgot plumbing hazards. These occur comparatively often at St James Court and may give many the most offense or cost. These include water and sewage related damage through pipe break or blockage. Storm water and tree damage may be related problems. The answer isn’t concrete.

We have had a lot of experience with noise. When people made complaints (one assumes to the managing agent of St James Court) the managing agent for the renters at this property (Ian rau) put a leaflet in all our letter boxes saying that if the place was noisy again he should be contacted on his email or telephone number which he also provided. This seemed to me to make a lot of sense as a procedure.

In this context, I find it interesting that an owner at St James Court recently wrote to us about her proposed renovations on the letterhead of the Central Australia Health Service, Northern Territory Health, NT Govt. She has also provided her telephone number and email address for us to reply. This is a vital logical start. However, one naturally finds it strange that she has used government letterhead, which includes the government ABN 59410835751 to address what I would otherwise assume are personal affairs. However, I can imagine a person living and working in Darwin may have a keen interest in bringing short term occupants to a place like ours in Glebe. Do we have a right to know or not? The decision that we do not is the first condition for corruption using public money. (Not that I am at all accusing my theoretical neighbour, who openly welcomes queries we may have.)

Towards more reliable and openly considered data driven management

Australian land planning and the rise of China are ideally related in this context and in regard to the recent *Independent Review of the NSW Regulatory Policy Framework* chaired by Nick Greiner. Australian health care tried to lead the way to developing more reliable data to serve population wellbeing through better planning. Surely the time has come for this in housing. The four potential options presented above appear to throw us back upon the open market, possibly hailing the next disastrous legal cab off the rank, acting in secret.

Over many years, those in the Australian Bureau of Statistics producing Census and other products, or in Australian health services and related state arenas, have given planning and data matters much thought, with a view to improving population wellbeing and performance. This data projection process nevertheless has many limitations, to the extent that it is normally driven by many blinkered market and professional service expectations, topped by lawyers. Mental health is ideally queried and built in regional terms to provide employment, exercise or related support. Spurious notions of science should not drive concepts of mental health and illness, which is not to deny the importance of any good service administration. In any narrow but supposedly therapeutic context key actors may perform inauthentically to fulfil the script, ignoring the question of drugs, depending on who provides them. The benefits of good data driven management need broader recognition.

More open learning and management approaches which are more openly responsive to individual demand as well as being more reliable are required to address the human need for personal security and stimulating environments better. Development hazards, risk, and insurance are ideally treated in related regional place and person based circumstances.

The federal budget for 2017 discussed housing only somewhat, in a context where land, property and industrial relations are all key state government matters, like insurance. To the extent that disability is highly related to the aging process the full funding of the disability support scheme and the regional development fund may be seen as a budget for old people without much positive attention to the protection of the environment for young people and to the globally warming future. I am naturally also concerned about the future of the Land and Property Information Service e-Dealing and its potential relationship to property-related corruption and business instability. One assumes this must be driven by lawyers, knowingly or unknowingly, because of their heightened power over unexplained words and secrets. This should be addressed in regard to Australian and related regions.

In the article "China to shed light on shadow banking" (AFR 7.7.17 p. 20), UBS economist Donna Quock is quoted to point out Chinese government largely owns the biggest lenders (banks) and borrowers (corporates) which means they have an outsized influence over debtors and creditors in the system. More than 95% of the debt is locally financed (rather than funded by flighty offshore lenders) and mainly through the banking system. Domestic savings are very high, mostly as deposits in banks. And last, policy makers continue to control the movement of money in and out of the country, reducing the risk of capital flight. This is the regional and related context which is ideally addressed in the light of the normal US assumptions we grew up with in Australia, whether we recognize any of them or not.

I leave you with a key Quotation from Mao Zedong. He said, *"Only through the practice of the people, that is, through experience, can we verify whether a policy is correct or wrong and determine to what extent it is correct or wrong.....Therefore, before any action is taken, we must explain the policy, which we have formulated in the light of the given circumstances, to Party members and to the masses.....If we actually forget the Party's general line and general policy, then we shall be blind, half-baked, muddle headed revolutionaries, and when we carry out a specific line for work and a specific policy, we shall lose our bearings and vacillate now to the left and now to the right, and the work will suffer."*

Baby, ain't it the truth? I learned that at the knees of WorkCover in the 1980s and beyond. But whither the Party and related association today? Cheers and good luck to you all,

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