Northern & Yorke Local Government Association

Submission to the South Australian Government Consultation

Proposed Short Stay Accommodation Register, Code of Conduct and Related Reforms

October 2026

Prepared by:

Bridget Ransome
Chief Executive Officer
Northern & Yorke Local Government Association

Introduction

The Northern & Yorke Local Government Association (N&YLGA) welcomes the opportunity to provide a regional local government perspective on the South Australian Government's proposed Short Stay Accommodation (SSA) Register, Code of Conduct and related reforms.

N&YLGA represents 15 regional South Australian councils across the Yorke Peninsula, Mid North, Lower North, Clare Valley, Southern Flinders and adjoining regions. The region contains a diverse mix of agricultural communities, coastal and holiday settlements, regional service centres, tourism destinations and remote communities.

N&YLGA recognises that short-stay accommodation is an important component of the regional visitor economy. In many communities, private holiday homes and short-stay properties provide accommodation that is not otherwise available through hotels, motels or caravan parks. This is particularly important during holiday periods, events, festivals and peak tourism seasons.

At the same time, the Association recognises that the growth of short-stay accommodation raises legitimate questions about housing availability, neighbourhood amenity, safety, compliance and the respective responsibilities of State Government, local government, property owners and booking platforms.

The Association considers that these issues need to be understood in their regional context. A regulatory framework designed principally around metropolitan housing markets should not inadvertently disadvantage regional communities where the role, economics and pattern of short-stay accommodation can be substantially different.

The current Discussion Paper itself recognises the dual role of short-stay accommodation: it can contribute to tourism and visitor capacity while potentially affecting long-term rental supply. The Government is seeking feedback on the design of the register, the role of councils, the proposed Code of Conduct, transitional arrangements and enforcement.

The Northern & Yorke regional context

Short-stay accommodation cannot be considered separately from the housing and tourism characteristics of the Northern & Yorke region.

The recently released *Yorke Peninsula and Mid North Regional Plan* identifies unoccupied dwellings ranging from approximately 16% to 49% across the Mid North, Lower North and Yorke Peninsula. It specifically notes that these high levels are associated with seasonal holiday rentals and private holiday homes.

This is an important distinction. An unoccupied dwelling on Census night is not necessarily a short-stay property, nor does a high proportion of unoccupied dwellings establish that short-

stay accommodation is causing a shortage of long-term rental housing. Regional housing data needs to be interpreted carefully before regulatory measures are targeted at the SSA sector.

Yorke Peninsula Council

Yorke Peninsula provides one of the clearest examples of the regional complexity.

The 2021 Census recorded 4,708 unoccupied private dwellings, representing 48.7% of private dwellings in the Yorke Peninsula Council area.

Yorke Peninsula Council's own *Strategic Management Plan* identifies the high level of unoccupied housing as reflecting the area's coastal character, seasonal residents and holiday homeowners.

The region's accommodation market is consequently quite different from metropolitan rental markets. The *Yorke Peninsula Destination Management Plan 2026–2030* states that the Peninsula's accommodation supply is dominated by short-stay self-contained homes and motel accommodation, alongside a strong network of publicly owned caravan parks. It also identifies opportunities to diversify and expand accommodation supply.

There is a risk that a regulatory approach which treats all entire-home short-stay accommodation as equivalent to residential properties removed from the permanent rental market will not accurately reflect the Yorke Peninsula market.

The 2025 parliamentary inquiry also heard directly from Yorke Peninsula tourism and accommodation interests. Country Getaways Holiday Rentals, based at Maitland and managing approximately 200 self-contained properties, submitted evidence concerning the role of holiday accommodation on the Peninsula. Reporting of that evidence highlighted the importance of distinguishing properties intentionally retained as holiday homes from properties that might otherwise be available as long-term rentals.

This is an important issue for any State-wide regulatory framework.

Barunga West Council

Barunga West provides another example of a highly seasonal coastal housing market.

The Local Government Grants Commission research into non-resident ratepayers identified 39% of private dwellings in Barunga West as unoccupied, placing the Council among the South Australian local government areas with the highest proportions of unoccupied dwellings. The research also found that councils had reported increased impacts associated with non-resident properties following the growth of platforms such as Airbnb and similar services.

The Port Broughton area illustrates the tourism dimension of this market. Private holiday houses form part of the visitor accommodation offer alongside established commercial accommodation.

The implication for the proposed register is that seasonality, private holiday ownership and genuine tourism demand need to be captured in the regulatory model, rather than assuming that all unoccupied coastal dwellings represent lost permanent rental stock.

Copper Coast Council

Copper Coast is another significant example. The same South Australian Government research identified 28% of private dwellings in the Copper Coast Council area as unoccupied.

The *Yorke Peninsula and Mid North Regional Plan* identifies the Copper Coast and Barunga West areas as locations where population growth is expected to be particularly concentrated, supported by existing services, economic activity and infrastructure.

The Copper Coast's coastal communities, including Wallaroo, Moonta and Moonta Bay, have substantial seasonal and visitor accommodation requirements. In this context, short-stay accommodation contributes to visitor capacity but also interacts with the availability of housing for permanent residents and workers.

The regulatory framework needs to distinguish between:

- A permanently commercialised short-stay property
- A privately owned holiday home used by the owner for part of the year
- A dwelling made available intermittently to visitors
- Hosted accommodation
- Accommodation associated with a farm or tourism business
- A residential property that could realistically otherwise operate as a long-term rental.

Clare and Gilbert Valleys Council

The Clare Valley demonstrates the importance of short-stay accommodation to regional tourism.

The *Yorke Peninsula and Mid North Regional Plan* records $162 million in visitor expenditure in the Clare Valley in the year ending 2024, including approximately 356,000 daytrips and 222,000 overnight visitors. The Plan identifies quality accommodation as important to attracting interstate and international visitors and supporting the region's tourism development.

The Clare Valley accommodation offer includes heritage cottages, B&Bs, farm and vineyard accommodation, retreats, caravan accommodation and other forms of visitor accommodation.

This illustrates why the regulatory framework should not unintentionally reduce the diversity of regional accommodation at a time when the State is seeking to increase visitor expenditure and overnight visitation.

Southern Flinders and Flinders Ranges

The same principle applies to communities such as Quorn and Hawker and to tourism destinations across the Flinders Ranges.

The Flinders Ranges Council actively promotes self-contained short-stay accommodation in Quorn, including properties located within the township and close to local businesses and services.

In smaller regional communities, relatively small numbers of visitor properties can make a material difference to the local visitor economy. At the same time, a single property may have potential importance as accommodation for workers, families or other residents.

A State-wide system needs to recognise the very different scale and function of short-stay accommodation across metropolitan, regional coastal, agricultural and remote communities.

Key issues for the proposed Register

A statewide register is an opportunity to obtain better data

There is currently no reliable central database identifying the number of active SSA properties or their occupancy levels. The State Government's consultation paper identifies this as a significant gap.

A properly designed register could provide a much stronger evidence base for future policy.

For regional South Australia, the data should be capable of identifying, at a minimum:

- Property location
- Hosted or non-hosted accommodation
- Dwelling type
- Number of bedrooms and guest capacity
- Number of nights available
- Number of nights actually occupied
- Whether the property is the owner's principal residence
- Whether the property is also used as a private holiday home
- Whether it has an existing development approval or planning consent
- Whether it is operated commercially or intermittently
- The booking platform or platforms through which it is advertised

- Whether the property is available for long-term rental when not being used for short stays.

Without this information, it will be difficult to determine whether changes in the SSA sector are actually increasing or decreasing the supply of long-term rental housing.

The role of councils

The Discussion Paper proposes that councils could oversee registration and renewals through a central register and potentially determine local land-use codes, rates and charges. It also proposes that councils would share compliance and enforcement responsibilities with CBS where a Code of Conduct is introduced.

This raises significant practical issues for regional councils.

Many N&YLGA councils operate with small planning, environmental health and compliance teams covering very large geographic areas. A new State-mandated registration and enforcement function could impose substantial administrative costs.

For example, the difference between managing a register for a metropolitan council with thousands of properties in a compact geographic area and managing a register across a regional council covering thousands of square kilometres is substantial.

Accordingly, any responsibilities allocated to councils should be accompanied by:

1. Full cost recovery for registration and renewal administration
2. A State-funded implementation period
3. Clear statutory responsibilities and enforcement powers
4. A standardised statewide digital system
5. Common definitions and processes
6. Access to booking-platform data
7. Clear protocols between CBS, councils and other regulatory agencies
8. Clear arrangements for complaints that fall outside local government responsibilities.

Registration fees should not simply become another source of administrative burden for councils.

The proposed model should also avoid requiring councils to duplicate information already held by CBS, booking platforms or other State agencies.

A single statewide Code of Conduct

The consultation asks whether South Australia should adopt a Code of Conduct and whether that Code should be uniform across the State.

For regional communities, consistency would provide considerable practical benefit.

A statewide minimum Code could establish consistent requirements concerning:

- Noise
- Parties and gatherings
- Waste and rubbish
- Parking
- Maximum occupancy
- Pets
- Fire and emergency safety
- Behaviour of guests
- Property maintenance
- Emergency contacts
- Neighbour complaints
- Guest identification where appropriate
- Property manager/host responsibilities
- Consequences for repeated non-compliance.

However, the Code should operate as a minimum statewide standard, rather than preventing councils from responding to legitimate local planning or environmental circumstances.

The circumstances of a coastal holiday settlement, a vineyard property, a town-centre apartment and a remote rural dwelling are not identical.

A local contact person should be mandatory

One issue that warrants particular consideration is the ability of residents and councils to obtain a timely response when problems occur.

The regulatory framework should require every registered non-hosted SSA property to nominate a responsible person who can be contacted 24 hours a day and who has authority to address:

- Excessive noise
- Rubbish
- Damage
- Other significant disturbances.
- Parties
- Parking
- Unsafe behaviour

The responsible person should be located within a reasonable distance of the property or have an appropriate local management arrangement.

This would provide a practical mechanism for addressing neighbourhood issues without automatically requiring councils to become the first point of contact for every complaint.

Public access to the Register

The consultation specifically asks whether the Register should be publicly available. There is value in allowing a member of the public to verify whether a property is legitimately registered.

However, N&YLGAs regional perspective indicates that privacy and safety considerations should also be carefully considered.

A public register could identify:

- Property address
- Registration number
- Registration status
- Accommodation type
- Maximum guest capacity
- Hosted/non-hosted status
- Whether relevant compliance requirements have been met.

Personal information about owners or hosts should not necessarily be publicly searchable.

A useful model would be a public verification register rather than a public database of personal information.

Fees and cost recovery

The Discussion Paper proposes an application and registration fee and annual return fee, with councils potentially determining the annual fee within a range set by the Minister.

For regional councils, the fee structure should reflect the actual cost of administration and compliance without creating disproportionate costs for small-scale regional operators.

There is a significant difference between:

- A homeowner occasionally making a holiday property available
- A hosted B&B
- A farm stay

- A small local accommodation operator
- A large commercial operator managing multiple properties.

A flat fee could have unintended consequences. Consideration should be given to a graduated fee structure based on factors such as:

- Number of properties operated
- Number of nights available
- Commercial scale
- Hosted/non-hosted status
- The level of regulatory oversight required.

Any fees collected for council administration should be transparently linked to the costs incurred by councils.

Housing supply – the need for better evidence

N&YLGA considers that the relationship between SSA and long-term rental supply should be examined using regional data rather than assumptions.

The region has a substantial stock of unoccupied dwellings, particularly in coastal communities. However, unoccupied dwellings include holiday homes, seasonal residences, properties undergoing sale or renovation, vacant properties and other categories in addition to short-stay accommodation.

The Yorke Peninsula example demonstrates this clearly: almost half of private dwellings were unoccupied on Census night, but Council identifies the area's seasonal and holiday-home characteristics as a significant reason.

The 2026 regional plan similarly identifies seasonal holiday rentals and private holiday homes as an important factor in regional dwelling vacancy. Accordingly, the Register should be used to build an evidence base capable of answering:

How many dwellings are genuinely being removed from the long-term rental market because of short-stay accommodation?

That question is more useful for policy purposes than simply counting all SSA properties.

Regional economic impacts

The State's own consultation material recognises that SSA contributes to tourism and event capacity. This is particularly important for Northern & Yorke.

Regional accommodation supports expenditure across:

- Hospitality
- Wineries and cellar doors
- Fuel
- Fishing and boating
- Transport
- Trades and maintenance
- Restaurants and cafes
- Retail
- Recreation
- Events
- Cleaning and property management
- Tourism operators.

The *Yorke Peninsula Destination Management Plan* identifies the region's existing reliance on self-contained short-stay accommodation and specifically identifies accommodation diversification as an opportunity for future tourism growth.

Similarly, the Clare Valley's substantial overnight visitor economy demonstrates the relationship between accommodation supply and regional tourism expenditure.

Any future restrictions or compliance requirements should be assessed against their potential impact on regional accommodation capacity and visitor expenditure as well as housing outcomes.

Planning and the proposed new land-use category

The proposal to amend the Local Government (General) Regulations 2013 to recognise SSA as a separate land-use category has potentially significant implications for regional councils.

The planning framework should provide clear guidance on the circumstances in which SSA:

- Is permitted
- Requires development approval
- Can operate in residential zones
- Can operate in rural areas
- Can operate in coastal settlements
- Can operate in heritage buildings
- Can operate as part of a farm or tourism enterprise
- Can operate in conjunction with other approved accommodation uses.

The State should avoid creating a situation where every existing regional holiday home is retrospectively subjected to complex planning requirements. Any new planning requirements should be proportionate to risk and should recognise established regional tourism patterns.

Transitional arrangements

The Discussion Paper proposes a transitional period of 6–12 months.

For Northern & Yorke councils, a longer or staged implementation process may be necessary.

Regional property owners may be:

- Interstate or overseas
- Absentee owners
- Seasonal residents
- Elderly property owners
- Owners who only use platforms intermittently
- Owners who engage a local property manager.

A comprehensive education campaign will be necessary before penalties are applied.

Implementation should include:

- Clear definitions
- Simple online registration
- A single State portal
- Direct communication with known accommodation operators
- Information through councils and tourism bodies
- Multilingual or accessible information where appropriate
- Education for property managers
- A grace period
- A warning/education phase before penalties
- Dedicated support for regional operators.

Enforcement

The Discussion Paper proposes that councils would manage complaints relating to alleged Code breaches, while CBS would undertake compliance activities relating to registration.

This division of responsibilities needs to be considerably more detailed before implementation.

For example, the legislation should establish who is responsible where a complaint concerns:

- Planning approval
- Excessive noise
- Public nuisance
- Unsafe accommodation
- Misleading advertising
- An unregistered property
- Illegal building work
- Overcrowding
- Waste
- Parking
- Criminal behaviour
- Repeated breaches of the Code.

The State should establish a single statewide complaints and triage framework, with matters automatically referred to the appropriate agency.

Councils should not become the default enforcement agency for matters that properly belong to CBS, SAPOL, planning authorities or other State agencies.

Data sharing

Mandatory data sharing with booking platforms is particularly important.

The consultation paper contemplates requiring platforms to provide data about SSA properties being advertised and potentially requiring owners to provide annual information about property usage and revenue.

For the system to be effective, the State should seek sufficient data to identify:

- Properties being advertised
- Number of nights available
- Number of bookings
- Number of nights occupied
- Type of accommodation
- Host status

- Changes in the operating status of properties.

This should be provided to councils in an appropriate form so that local planning and housing analysis can be undertaken without requiring councils to undertake manual monitoring of multiple online platforms.

Matters requiring particular consideration for regional South Australia

N&YLGAs regional experience suggests that the final framework should specifically consider:

Seasonal communities

Coastal settlements may have very high levels of holiday-home ownership and significantly different occupancy patterns between summer, school holidays and the remainder of the year.

Agricultural areas

Farm stays and rural tourism accommodation can be important components of farm diversification and regional tourism.

Events

Regional festivals, sporting events and tourism events can temporarily create demand far beyond the capacity of conventional accommodation providers.

Workforce accommodation

Properties used intermittently for seasonal or project workers should not automatically be treated in the same manner as conventional tourist accommodation.

Small operators

Many regional accommodation businesses are family-operated enterprises rather than large commercial businesses.

Remote areas

Enforcement and compliance arrangements must be realistic in communities where councils may have very small staffing establishments and large geographic areas.

Housing markets

Regional rental markets can be affected by factors including limited construction, high building costs, ageing housing stock, worker accommodation requirements and population change. Short-stay accommodation should be considered as one factor within a much broader regional housing system.

Suggested principles for the final framework

Based on the regional evidence available to N&YLGA, the following principles warrant consideration in finalising the reforms:

1. One statewide register should replace fragmented local arrangements.
2. The register should provide reliable, standardised data capable of distinguishing commercial short-stay accommodation from seasonal and occasional holiday-home use.
3. A consistent statewide Code of Conduct should establish minimum standards for hosts, guests and booking platforms.
4. Councils should have a defined role, but new registration and enforcement responsibilities must be fully costed and funded.
5. The State should provide a single digital registration and complaints platform.
6. Booking platforms should be required to participate in data sharing and compliance mechanisms.
7. The public should be able to verify registration and compliance, while unnecessary personal information should remain protected.
8. Regulation should be proportionate to the scale and nature of the operation.
9. Regional tourism and accommodation supply should be explicitly considered in assessing any future restrictions.
10. Housing policy should be based on evidence demonstrating the actual relationship between SSA and long-term rental supply**,** rather than relying on unoccupied dwelling statistics alone.
11. Existing operators should receive a clear and adequately funded transition period.
12. The framework should be reviewed after implementation using regional as well as metropolitan data.

Conclusion

Northern and Yorke presents a distinctive case for the development of a statewide short-stay accommodation framework.

The region contains communities where short-stay accommodation is an important part of the visitor economy, alongside communities where access to long-term housing and worker accommodation is an increasing concern.

The available evidence demonstrates the complexity of the issue. Yorke Peninsula, for example, has a very high proportion of unoccupied dwellings, while its tourism strategy identifies self-contained short-stay accommodation as a major component of visitor accommodation and an area for future diversification.

Similarly, the Clare Valley's substantial overnight visitor economy demonstrates the importance of maintaining sufficient accommodation capacity in regional tourism destinations.

The proposed Register provides an opportunity to address the current lack of reliable statewide data and to establish clearer expectations for operators, guests, booking platforms, councils and State Government.

For Northern & Yorke, the success of the reforms will depend on ensuring that the final framework recognises the diversity of regional housing and tourism markets, provides councils with the resources and systems necessary to undertake any new responsibilities, and uses reliable data to distinguish genuine housing impacts from the normal operation of seasonal and regional tourism markets.

N&YLGA encourages the State Government to maintain close engagement with regional councils as the detailed legislative, administrative and operational arrangements are developed.

Bridget Ransome
Chief Executive Officer
Northern & Yorke Local Government Association
Mobile: 0403 008 331
Email: ceo@nylga.sa.gov.au

NYLGA
NORTHERN & YORKE
LOCAL GOVERNMENT ASSOCIATION

References

1. **South Australian Government – YourSAy**
   Short Stay Accommodation Register, Code of Conduct and related reforms – consultation
   South Australian Government, 2026. South Australian Government consultation – Short Stay Accommodation Register

2. **South Australian Government – YourSAy**
   Short Stay Accommodation Register – Discussion Paper, South Australian Government, 2026. Discussion Paper – Short Stay Accommodation Register

3. **Australian Bureau of Statistics**
   2021 Census – Yorke Peninsula, Census All persons QuickStats
   ABS, 2021. The Census records 4,708 unoccupied private dwellings, or 48.7% of private dwellings, in the Yorke Peninsula LGA. (Australian Bureau of Statistics)
   ABS – Yorke Peninsula 2021 Census QuickStats

4. **Australian Bureau of Statistics**
   2021 Census – Barunga West, Census All persons QuickStats
   ABS, 2021. The Census records 704 unoccupied private dwellings, or 38.7%, in Barunga West. (Australian Bureau of Statistics) ABS – Barunga West 2021 Census QuickStats

5. **Australian Bureau of Statistics**
   2021 Census – Copper Coast, Census All persons QuickStats
   ABS, 2021. This source should be used for the Copper Coast dwelling data rather than relying on the rounded figure in the earlier draft. ABS – Copper Coast 2021 Census QuickStats

6. **South Australian Local Government Grants Commission**
   Non-Resident Ratepayers – Final Report. Department for Infrastructure and Transport, South Australia, May 2024. This report examines the prevalence and implications of non-resident ratepayers and unoccupied dwellings across South Australian councils, including the relationship between seasonal/holiday properties and local government.
   South Australian Government – Local Government Grants Commission research

7. **South Australian Government, Planning and Land Use Services**
   Yorke Peninsula and Mid North Regional Plan. Government of South Australia, 2026.
   The Plan provides regional housing, population, tourism and economic context and discusses the high levels of unoccupied dwellings associated with seasonal and holiday housing. Yorke Peninsula and Mid North Regional Plan

8. **Yorke Peninsula Council**
Strategic Management Plan 2025–2029. Yorke Peninsula Council.
The Plan provides Council's strategic context concerning its coastal communities, population, housing and seasonal/non-resident population characteristics.
Yorke Peninsula Council – Strategic Management Plan 2025–2029

9. **South Australian Tourism Commission**
Yorke Peninsula Destination Management Plan 2026–2030
Tourism SA, 2026. The Plan identifies accommodation, visitor capacity, tourism investment and the importance of developing the region's visitor economy. (Tourism SA)
Yorke Peninsula Destination Management Plan 2026–2030

10. **South Australian Tourism Commission**
South Australia's Mid North and Yorke Tourism Zone – Regional Tourism Documents
Tourism SA, 2026. Provides access to the Yorke Peninsula, Clare Valley and Southern Flinders Destination Management Plans and regional tourism data. (Tourism SA)
Mid North and Yorke Tourism Zone – Tourism SA

11. **South Australian Tourism Commission**
Clare Valley – Annual Visitor Summary, Year End December 2024
Tourism SA. Reports $162 million in total visitor expenditure in the Clare Valley for the year ending December 2024, including 222,000 overnight visitors and 356,000 domestic day trips. (Tourism SA) Clare Valley Visitor Summary – Tourism SA

12. **Clare Valley Tourism**
Stay – Clare Valley Accommodation. Clare Valley Tourism. Provides evidence of the range and character of visitor accommodation in the Clare Valley, including cottages, B&Bs, vineyard accommodation, heritage properties and country pubs. (Discover the Clare Valley) Clare Valley accommodation directory

13. **Flinders Ranges Council**
Self-contained accommodation and bed & breakfast – Quorn
Flinders Ranges Council. Provides a regional example of self-contained short-stay accommodation in Quorn and its role within the local tourism offer.
Flinders Ranges Council – Self-contained accommodation

14. **Yorke Peninsula Visitor Information / Yorke Peninsula Tourism**
Yorke Peninsula Visitor Guide 2023 – Country Getaways Holiday Rentals
The guide identifies Country Getaways Holiday Rentals as a locally operated holiday accommodation business representing more than 200 rental properties across Yorke Peninsula. (Yorke Peninsula) Yorke Peninsula Visitor Guide 2023

15. **Yorke Peninsula Country Times**
    A holiday home you can enjoy — and one that works for you. 31 March 2026.
    The article states that Country Getaways Holiday Rentals, based at Maitland, manages more than 200 holiday homes across Yorke Peninsula and Adelaide. (Yorke Peninsula Country Times) Yorke Peninsula Country Times – Country Getaways article