

DISCUSSION PAPER

Long Term Un-hosted STRA LPP

This discussion paper aims to guide the development of a Local Planning Policy for un-hosted STRA operating for more than 90 days in a 12-month period, with a focus on residential zoned properties.

1. Purpose and Introduction

In late 2023, the Western Australian Planning Commission released its [*Position Statement: Planning for Tourism and Short-Term Rental Accommodation \(November 2024\)*](#), establishing a State-wide framework for managing STRA.

In response, [*Scheme Amendment No.183*](#) to the City of Cockburn Local Planning Scheme No.3 was approved in October 2025, including changes to reflect the deemed land use classifications for hosted and un-hosted STRA.

The State Government's STRA planning reforms are primarily implemented through the *Planning and Development (Local Planning Schemes) Regulations 2015*. Since 1 January 2025, all STRA providers are required to register, with an exemption from development approval applying to un-hosted STRA leased for 90 nights or less within a 12-month period.

Although the reforms provide a consistent planning framework, they do not account for all local impacts of STRA. As a result, consideration is being given to the need for a local STRA policy to guide decision-making and the assessment of un-hosted STRA applications within the City of Cockburn.

2. Regulatory and Strategic Context

Local governments retain discretion to manage land-use impacts of STRA through local planning policies. WALGA's [*Local Planning Policy Guidelines for Unhosted Short-Term Rental Accommodation \(2024\)*](#) highlight the importance of managing residential amenities while maintaining fair and consistent decision-making.

Within the City, [*Local Planning Policy \(LPP\) 1.15 – Tourist Accommodation*](#) provides some basic guidance for the assessment of un-hosted STRA.

Recent State Administrative Tribunal decisions in Belmont and Vincent have treated un-hosted STRA as a commercial use in certain contexts, reinforcing the importance of clear policy direction and objectives, particularly in relation to location and amenity.

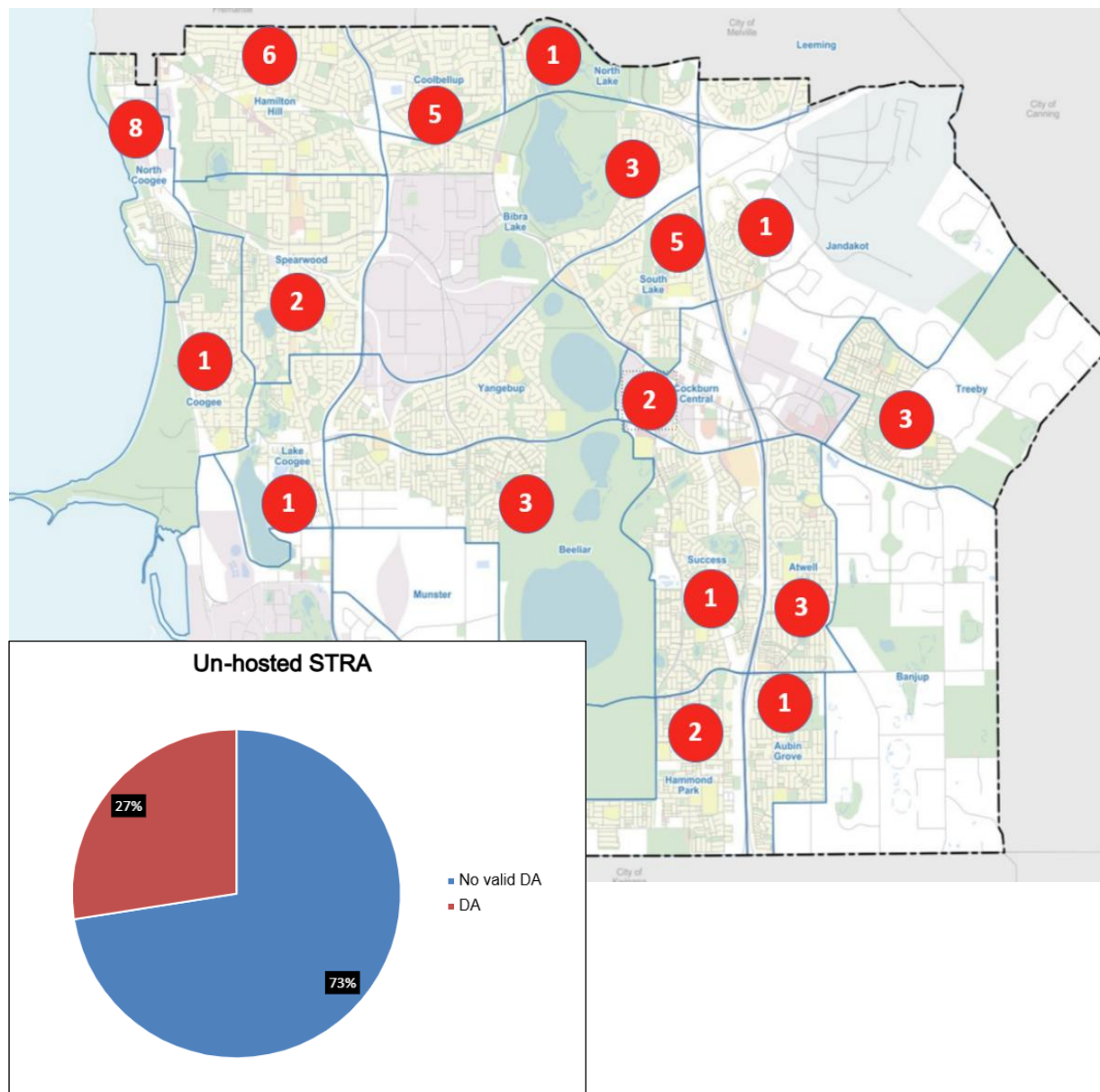
3. Local Context – City of Cockburn

As of April 2026, the City currently has just over 330 registered short-term rental accommodation (STRA) properties. Of these, slightly more than half are un-hosted.

Within the un-hosted STRA cohort, approximately 27 per cent have a valid development approval. For the purpose of this discussion, it is assumed that these 27 per cent of un-hosted STRA are operating for more than 90 days per year, equating to approximately 47 properties. This remains an assumption, noting that some approved STRA may operate for fewer than 90 days, while some unapproved STRA may exceed this threshold.

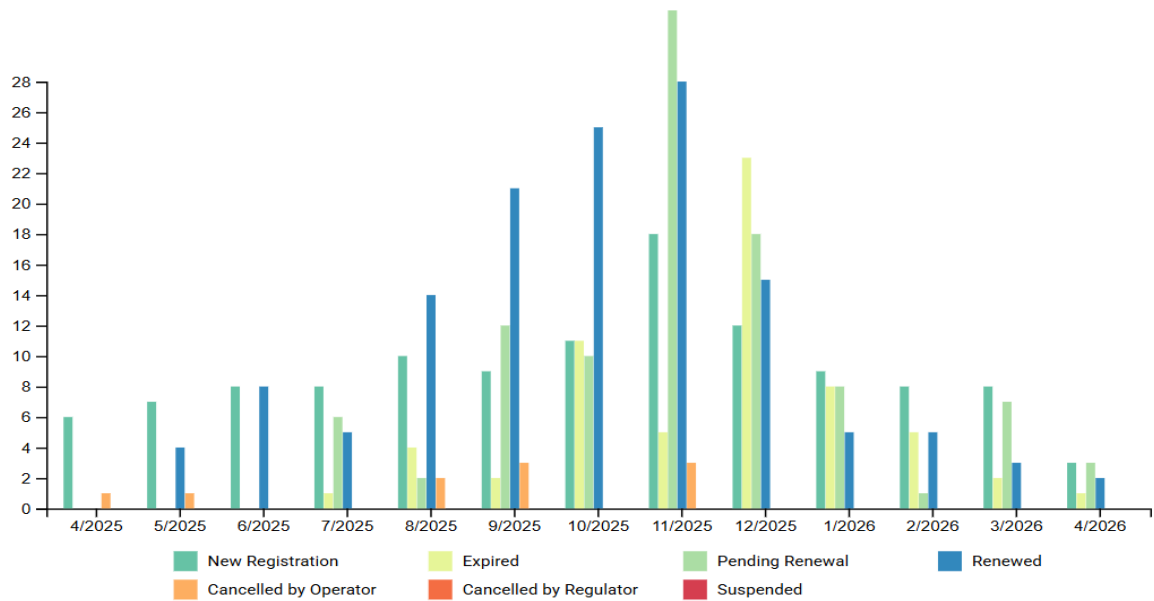
Currently, there is no mechanism for the City to actively monitor properties nearing the 90-day limit. Although the State Government issues automated warning notifications, the City does not track or typically engage with owners unless a complaint is made.

The map below shows how these un-hosted STRA with an approved DA are spread over the suburbs.



Of note, the number of STRA registration has been decreasing since November 2025 as shown on the graph below.

STRA Registration Status



4. Key issues and Consideration

4.1 General considerations

The City must consider housing availability and affordability. A study published by National Shelter (a peak body working to improve housing outcomes for low-income Australians), shows how unaffordable rental already is in Perth for almost all type of households.

[Research from the Australian and Urban Research Institute](#) indicates that STRA has expanded significantly over the past two decades, largely driven by the growth of digital booking platforms. While total STRA listings declined slightly between 2019 and 2023, the number of non-hosted STRA dwellings (entire homes) increased and now represents most listings, rising from 45 per cent in 2019 to 58 per cent in 2023.

The same research indicates that although un-hosted STRA can reduce the availability of dwellings within the long-term rental market, thereby contributing to housing supply pressures, it is generally a secondary factor in metropolitan housing markets; however, it can exacerbate housing pressures in areas where it is highly concentrated.

Household	RAI score	Rent as a share of income	Relative Unaffordability
Single pensioner	35	86%	Critically unaffordable
Pensioner couple	57	53%	Extremely unaffordable
Single person on benefits	22	136%	Critically unaffordable
Single part-time worker parent on benefits	41	74%	Extremely unaffordable
Single working parent	98	31%	Unaffordable
Student sharehouse	89	34%	Unaffordable
Single income couple with children	98	31%	Unaffordable
Dual income couple with children	196	15%	Affordable
Minimum wage couple	84	36%	Unaffordable
Hospitality worker	60	50%	Extremely unaffordable

Source: SGS Economics and Planning, 2025

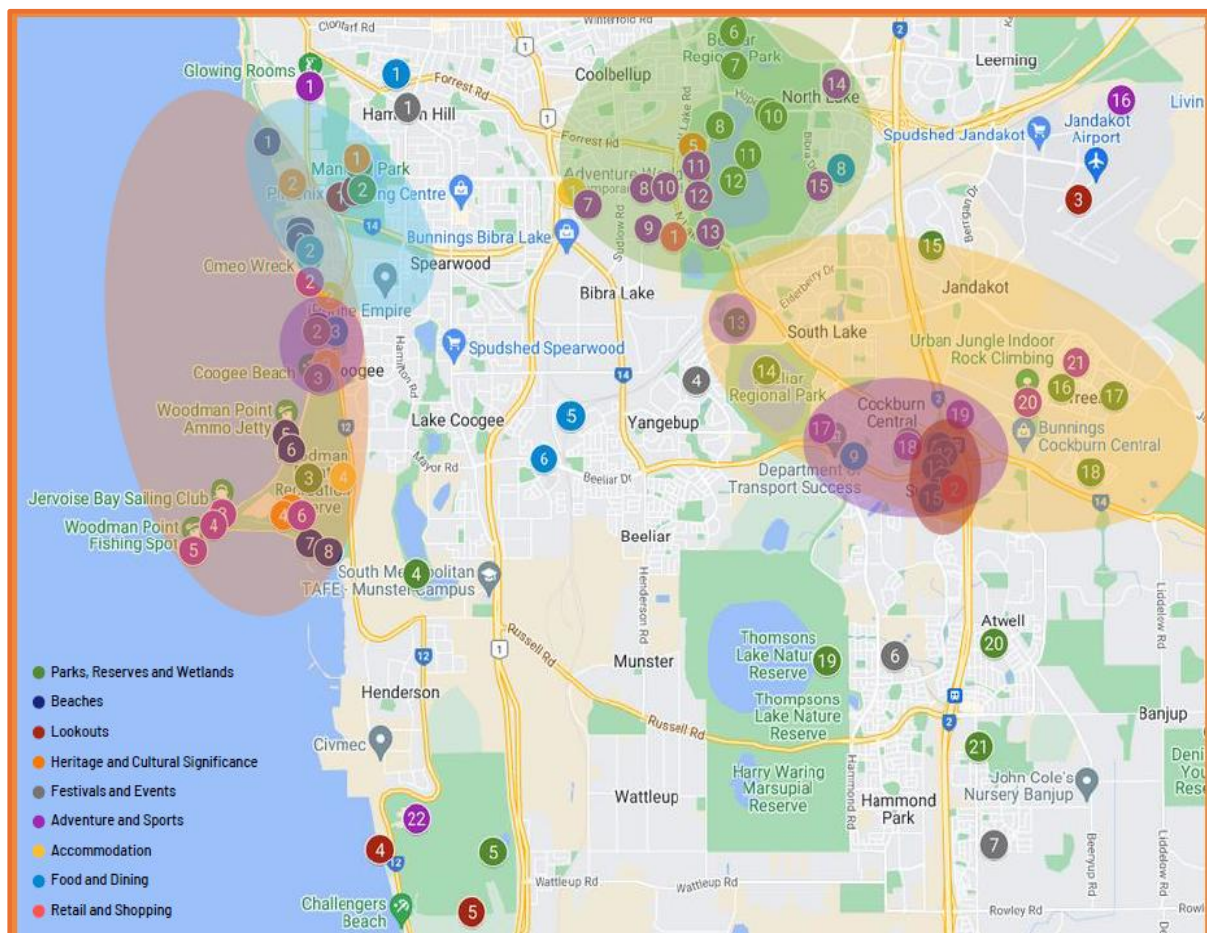
In WA, evidence consistently identifies population growth, insufficient dwelling delivery, construction delays and income not keeping pace with rental increase as the main drivers of the housing crisis ([The Bankwest Curtin Economics Centre](#)).

4.2 Cockburn's specific considerations

Key issues associated with STRA include potential amenity impacts such as noise, parking pressure, and changes to neighborhood character, which can result in complaints. At this stage, the number of complaints related to STRA is limited in the City of Cockburn.

Closely linked to the housing supply discussed above is population growth. The City of Cockburn's population is forecast to increase by 30% between 2026 and 2046, placing it among the five fastest-growing local government areas in the Perth metropolitan region ([Fastest growing local government areas \(LGAs\) | Centre for Population](#))

Another factor for consideration is tourism and the need to balance tourism benefits with residential amenity. The City of Cockburn is not a major standalone tourism destination in the Western Australian or Perth visitor economy. Instead, it functions primarily as a recreation, leisure and day-trip destination, servicing local and regional visitors, with tourism activity that is supplementary to neighbouring hubs such as Fremantle, Perth CBD and Rottnest Island with the following attractions hotspot identified by the DRAFT '*City of Cockburn Destination Plan 2024-2034*'.



The City of Cockburn offers a diverse mix of accommodation types, including caravan and camping facilities, hotels, apartments, and holiday accommodation within private dwellings. Holiday accommodation is the most prevalent form, and accommodation is well distributed across the City, with higher concentrations in Coogee Beach, Bibra Lake and Hamilton Hill.

Coogee Beach attracts visitors because of its beachside apartments, marina access and strong local amenities; Bibra Lake is particularly popular with families due to its major attractions and school-holiday activities; and Hamilton Hill appeals to visitors seeking character areas with convenient access to Fremantle while avoiding congestion and parking constraints (City of Cockburn Visitor Asset Audit Report, 2022).

The City is also supported by over 320 registered STRA properties that are widely spread across the local government area, helping to meet visitor demand and supplement the broader accommodation offer (City of Cockburn Visitor Asset Audit Report, 2022).

The [Heat map - Short Term Rental Accommodation](#) shows how the existing short term accommodations are spread across the City.

5. Review of Other Local Government Approaches

Other metropolitan local governments have adopted a range of approaches to managing un-hosted STRA (where Development Approval is required). The most common approach observed includes the use of preferred locations near activity centers, transport corridors or public transport. Other Local Governments include operational controls such as occupancy limits or minimum stay; and exclusion of undesirable locations or a cap on the number of approved STRA within the district.

A summary of the main elements in the policy of 9 Local Governments within the Perth metropolitan region is provided beside.

LOCAL GOVERNMENT	PREFERRED LOCATION / SPATIAL CONTROLS	ADDITIONAL ASSESSMENT OR EXCLUSION CRITERIA
City of Bayswater	Activity centres and station precincts, excluding Ashfield District Centre.	Applications outside preferred locations are assessed against additional criteria, including protection of residential amenity and proximity to regional or health facilities.
City of Belmont	Within 400m of a high-frequency public transport stop along Great Eastern Highway and an existing STRA, tourist accommodation use or hotel on Great Eastern Highway.	Clear instances where STRA will not be supported, including within 400m of a school and on grouped dwellings with lot sizes under 350m ² .
City of Stirling	Within (a) 400m of a designated centre; or (b) 200m of a Class 1, 2 or 3 corridor road; or (c) 40 m of the coastal MRS Parks & Recreation Reserve.	Proposals outside preferred locations are assessed through an amenity impact assessment addressing noise, traffic and impacts on nearby uses.
City of Melville	Near mixed-use zones, activity centres, hospitals or tertiary institutions, and locations well served by public transport and urban infrastructure.	Operational controls include minimum stay requirements, occupancy limits, a locally based management contact, and identification of undesirable site characteristics that may justify refusal including properties within a cul de sac or on battle-axe style rear lots.
City of Vincent	Medium and high-density areas, areas close to public transport, commercial, entertainment or tourist activities, or within 1 km of the Perth CBD.	Assessment considers separation from sensitive interfaces, existing ambient noise, contribution to accommodation diversity, and performance against preferred characteristics or broader objectives.
City of Fremantle	No prescribed preferred locations.	Consideration is given to the number of existing hosted and un-hosted STRA at the time of application to prioritise permanent residential occupation within the City Centre.
City of Gosnells	No specifically defined preferred locations.	Primary focus on ensuring STRA does not compromise the amenity of adjoining residents.
City of Joondalup	No preferred location approach identified.	Assessment primarily based on amenity impacts and site-specific considerations.
City of Wanneroo	No prescribed preferred locations.	Includes an objective of encouraging STRA in areas with good access to local services or visitor amenities.

6. Policy Options for Cockburn

Based on the above, there are 3 key approaches for the 'Residential' zone going from minimal to highly regulated:

1. MINIMAL REGULATION	To ensure un-hosted STRA is <u>designed and/or managed</u> to minimise unreasonable amenity impacts on nearby residents. Current policy's criteria : • Management plan required, • Generally, not supported in grouped or multiple dwelling. • Car parking to be located onsite • Number of car bays as per TPS3 (1 bay: 1 unit or bedroom) <i>Proceeding with this option assumes that the market will self-regulate, with the number of STRA remaining stable with no or limited impact on the housing/rental market and resulting in only limited impacts on the surrounding neighbourhood.</i>
2. MODERATELY REGULATED	To maintain the amenity and established character of residential zones through ensuring <u>the location, scale, design and operation</u> of un-hosted STRA is appropriate to the setting. And to establish a clear framework for the assessment and determination of applications for short term rental accommodation. As per 'minimal regulated' approach above + Potential Additional criteria • 1 booking for up to 3 bedrooms • Maximum of 2 guests per bedroom (excl. 16yo and younger) • Undesirable Location – properties located on grouped dwelling development without street frontage/ battle axe style rear lots and 400m from schools. • Signage • Time-limited approval • Emergency Evacuation Plan in Bushfire Areas <i>This option also assumes that the market will self-regulate, such that STRA numbers remain stable and do not have a significant impact on housing or rental supply, while maintaining an intention to better safeguard the amenity of residential areas.</i>
3. HIGHLY REGULATED	To discourage un-hosted short-term rental accommodation in residential areas to protect residential amenity and established ways of living; maintain housing availability and affordability for permanent residents; and support stable, cohesive & sustainable communities. And to establish a clear framework for the assessment and determination of applications for short-term rental accommodation in zones other than residential. *Un-hosted short-term accommodation may be considered in residential areas if it has a direct interface with noise generating (non-residential) uses. <i>This option aims at preventing the commercialisation of residential housing stock to protect residential amenity and prevent inflation, based on the idea that exempt STRA along with other forms of tourist accommodation are and will be sufficient to respond to the visitors demand within the City.</i>

6.1 Moderately regulated

The following outlines additional criteria proposed for consideration in the current policy, as well as the rationale for excluding certain criteria commonly used by other local governments that are considered unsuitable for Cockburn.

INCLUSION	CONSIDERATIONS
One booking for up to three bedrooms	Limits intensity of use and prevents large-scale commercialisation that could lead to noise, traffic and amenity impacts. Would need to be combined with maximum guests per bedroom to avoid large groups. Smaller groups typically tend to be more respectful of local issues than is often the case with larger group.
Maximum of two guests per bedroom (excl. 16yo and younger)	Controls occupancy levels, reduces overcrowding and maintains residential scale and amenity.
Undesirable locations: Rear battleaxe lots and lots without street frontage, except for the front lot of a grouped dwelling development even where access is provided via common property 400m from primary and secondary schools	Un-hosted STRA in lots without street frontage, including freehold rear battle axe properties, raises several amenity and management concerns. While not part of a common property arrangement, these lots often share similar constraints. • They are typically smaller and more compact, increasing the intensity of use and potential amenity impacts. • They are more enclosed, often surrounded by multiple adjoining properties (typically four rather than three), which amplifies the effect on neighbours. • Access arrangements can create conflict with frontage lot owners, particularly where driveways are shared or closely aligned. • Their rear location reduces visibility from the street, limiting passive surveillance and self-regulation of behaviour. Whilst the consent of surrounding lots could be required (prior to lodgement) or tested (during advertising) ongoing acceptance cannot be assured upon change of ownership. Collectively, these factors mean such lots are generally less suited to un-hosted STRA, as potential impacts are more concentrated and harder to manage compared to lots with direct street frontage. Protect long-term family housing near schools, as these locations are prime locations, well suited to stable residential communities. Areas within 400 metres of a school — equivalent to an approximate 5-minute walk — represent a highly walkable catchment for young children and should be preserved. Protect child sensitive land use from frequent turnover of occupants, visitors unfamiliar with local conditions, irregular parking/arrival/departures.
Time-limited approvals (1–5 years)	While Section 29 certificates are intended to provide a mechanism to suspend or cancel unlawful STRA registrations, recent attempts to utilise this provision have proven ineffective, even where strong supporting evidence exists. In many cases, applicants' circumstances remain unchanged over one or two-year periods, meaning that ongoing reassessment is

	largely administrative. However, there are instances where changes in circumstances may warrant the cancellation of approval. Given the time and resource-intensive nature of pursuing enforcement action under Section 29, it is more effective to apply a standard time limit to all STRA approvals. Introducing a time-limited approval framework — similar to approaches adopted by many other councils — would ensure periodic review of all registrations. This would provide a more efficient and proactive regulatory mechanism, while allowing well-managed operators to be granted longer approval periods where appropriate.
Signage	This measure could assist in making properties easily identifiable, enhancing operator accountability, and encouraging compliance with operational requirements. It would also provide neighbouring residents with a clear point of contact for resolving issues promptly. Whilst it could raise privacy concerns for operators, or lead to increased complaints, signage would improve transparency by helping the community better understand the presence and operation of STRA.
EXCLUSION	REASONING FOR EXCLUSION
Preferred locations <i>(tourism areas, activity centres, public transport)</i>	The City of Cockburn does not contain clearly designated long-term tourism areas. Identifying residential locations for STRA would introduce an unintended tourism function and may concentrate amenity impacts and risk displacing access to local services, public transport and neighbourhood facilities that are planned to support the needs of permanent residents first.
Cap on approved STRA within a Local Area	Caps are difficult to apply accurately or fairly due to the timing between application and approval, registration exemptions (all STRA operating less than 90 days), uncertainty in defining geographic boundaries.

7. Financial Risk and Implementation Implications

REGULATION LEVEL	PROS FOR THE CITY	CONS/RISK FOR THE CITY
MINIMAL REGULATION	• Supports tourism flexibility and flexibility for property owners • Low assessment and enforcement burden.	• Minimal protection of long-term rental supply • Limited control over intensity and guest numbers • Potential cumulative amenity impacts • Noise and parking complaints may arise • Less defensible planning decisions • Cancellation of STRA can be hard to obtain via Section 29. Certificate.
MODERATELY REGULATED	• Stronger amenity protection • Controls overcrowding, noise/parking impacts and sensitive land uses. • Balanced housing and tourism outcomes • More defensible planning decisions. • Clearer assessment criteria for both applicants and officers.	• Increased assessment and compliance effort. • Reduced STRA flexibility compared to the minimal regulation approach.
HIGHLY REGULATED	• Clear strategic signal prioritising permanent residents. • Supports housing and affordability. • Strong protection of residential amenity. • Reduced complaints in residential areas.	• Reduced flexibility for low-impact proposals • Potential loss of tourism accommodation supply. • Risk of unregistered or illegal STRA activity (may need to start tracking those without DA and going over the 90 days). • Potential financial impact and dissatisfaction for property owners who have invested in STRA • Risk of perceived rigidity, with Council seen as limiting property use without adequate justification • Potential increase in the number of appeals.

8. Key Stakeholders

The development of a local approach to short-term rental accommodation (STRA) requires consideration of a range of stakeholder interests, including residents, industry representatives, and government agencies.

Key stakeholders relevant to STRA within the City of Cockburn include:

- **Local residents and neighbourhoods**, particularly those in residential areas where un-hosted STRA may impact amenity, safety, housing availability, and established ways of living.
- **Property owners and STRA operators**, including individual homeowners and commercial operators who utilise dwellings for hosted or un-hosted short-term rental accommodation.
- **Industry bodies representing STRA operators**, including national organisations with Western Australian membership and advocacy roles, such as:
 - The [*Australia & New Zealand Short-Term Rental Association \(ASTRA\)*](#), which represents hosted and un-hosted STRA owners, operators, and managers and engages with governments on STRA policy and regulation.
 - The [*Short Term Accommodation Association Australia \(STAAA\)*](#), a national body supporting and advocating for STRA operators, including members and representatives based in Western Australia.
- **Western Australian Government agencies**, particularly the [*Department of Local Government, Industry Regulation and Safety*](#), which administers the State STRA Register and regulatory framework under the Short-Term Rental Accommodation Act 2024.
- **Traditional accommodation providers**, represented by groups such as the [*Australian Hotels Association \(WA\)*](#), who have an interest in regulatory consistency and the broader visitor accommodation market.

There are no Cockburn-specific or locally based STRA industry associations. Engagement with the STRA sector therefore occurs primarily through state or national representative bodies, alongside submissions from individual operators and property owners.

Stakeholder input will inform the City's understanding of impacts, implementation considerations, and regulatory effectiveness, while ensuring that STRA policy outcomes remain aligned with strategic planning objectives and the needs of the Cockburn community.