

22 February 2026

The Chief Executive Officer  
Brisbane City Council  
GPO Box 1434  
Brisbane Qld 4001

By email: [shortstay@brisbane.qld.gov.au](mailto:shortstay@brisbane.qld.gov.au)

To whom it may concern

**RE: Submission by Strata Community Association Queensland in support of the Short Stay Accommodation Local Law 2025 and Short Stay Accommodation Rule**

**1. About Strata Community Association Queensland**

Strata Community Association Queensland, SCAQ, is the peak body representing the strata sector in Queensland. SCAQ represents professional strata managers, support service providers and industry stakeholders who collectively support hundreds of thousands of Queenslanders living in community titles schemes.

SCAQ advocates for balanced, evidence-based policy settings that support good governance, protect residential amenity and enable strata communities to function effectively within a modern regulatory environment.

**2. SCAQ's Position**

SCAQ welcomes and broadly supports Brisbane City Council's proposed Short Stay Accommodation Local Law 2025 and accompanying Short Stay Accommodation Rule.

These reforms provide long needed clarity, transparency and regulatory consistency for strata communities that have been managing the impacts of short stay accommodation without a cohesive regulatory framework.

We support the introduction of a structured permit and registration system, enforceable operating conditions and complaint management requirements that protect residential amenity while allowing compliant short stay accommodation to operate responsibly.

However, we consider that certain planning elements of the proposal warrant further review to ensure unintended consequences do not undermine accommodation supply or broader economic objectives.

**3. Strategic Context: Brisbane 2032 and Major Event Readiness**

The timing of these reforms is significant in the context of Brisbane hosting the 2032 Olympic and Paralympic Games.

Major global events will place unprecedented pressure on accommodation supply across South East Queensland. Short stay accommodation will inevitably form part of the broader accommodation mix supporting visitors, workforce mobility and event related demand.

Events such as Riverfire, State of Origin, the Ekka and other major sporting and cultural events already generate accommodation shortages during peak periods. As Brisbane transitions toward 2032, it is critical that regulatory reform supports both amenity protection and sufficient accommodation capacity.

SCAQ supports reforms that allow Brisbane to demonstrate it can welcome visitors while maintaining liveability for residents who permanently reside in strata communities.

#### **4. Support for the Permit and Registration Framework**

SCAQ strongly supports the introduction of a mandatory permit and registration system.

A permit framework delivers essential oversight by identifying which properties are operating as short stay accommodation and ensuring those properties meet defined standards before operating.

This visibility is critical for strata communities. It allows committees to plan, set expectations, manage risk and respond appropriately to issues when they arise.

The proposed framework establishes clear processes for application, decision making, amendment, suspension and review, providing both enforceability and procedural fairness.

#### **5. Amenity Protection and Operating Conditions**

SCAQ supports the enforceable operating conditions proposed, including requirements relating to:

- Noise management
- Lighting impacts
- Waste management
- Use and enjoyment of land
- Restricted temporary structures
- A Code of Conduct
- Guest information obligations
- Public liability insurance requirements

These conditions appropriately target behaviour and impact rather than tenure, which is essential in mixed use strata communities.

The requirement to clearly display permit numbers in advertising further strengthens transparency and compliance.

## 6. 24 Hour Contact Person Requirement

The requirement to nominate a contact person who is available 24 hours a day, 7 days a week is a critical safeguard.

It provides a clear escalation pathway for issues arising outside normal business hours and reduces reliance on emergency services or informal dispute mechanisms.

This measure appropriately recognises that short stay accommodation is an active commercial use requiring active oversight.

## 7. Collaboration with Short Stay Accommodation Platforms

SCAQ's position is informed by constructive engagement with short stay accommodation providers, including Airbnb as a major platform operating within Queensland.

SCAQ has worked closely with Airbnb on the development of the Queensland Strata Hosting Guide and supporting checklists to promote responsible hosting, regulatory compliance, safety standards and respectful coexistence within strata communities.

Airbnb has publicly expressed support for a registration system and a code of conduct as mechanisms to strengthen transparency in the sector. SCAQ agrees that registration, behavioural standards and accountability are fundamental to effective regulation.

This collaboration demonstrates that clear rules and education can work alongside formal regulatory settings.

## 8. Areas Requiring Further Consideration

While SCAQ supports the overall direction of reform, we remain concerned about the potential cumulative impact of two specific elements.

### 8.1 Zoning Restrictions on Un Hosted Short Stay Accommodation in Low Density Areas

Council has framed this measure as primarily affecting quiet residential streets. In practice, Low Density zones include suburbs that play an important role in Brisbane's tourism and major event economy, including areas located near:

- Major stadiums and event venues
- Universities and hospital precincts
- Transport corridors
- Employment and commercial hubs

A prohibition on un-hosted short stay accommodation in these zones risks reducing available accommodation in areas vital to visitor dispersal and local economic activity.

Many short stay properties in these areas provide self-contained amenities such as kitchens, laundries and parking. These features are particularly attractive to families, longer stay visitors, medical travellers and event attendees.

There is a risk that zoning bans may shift demand into already concentrated precincts such as the CBD and South Bank, increasing pressure in those areas while reducing geographic distribution.

SCAQ supports amenity protection. However, zoning settings should be carefully calibrated to avoid unnecessary capacity constraints.

## **8.2 Mandatory Development Approvals as a Precondition to Registration**

The requirement for a Development Approval in certain zones prior to registration presents a significant barrier for many hosts.

For many operators, obtaining a Development Approval is complex, costly and time consuming. While some inner-city areas are exempt, the Low Medium Density zone, which includes a number of inner-city suburbs, would require a Development Approval before registration could occur.

The combined effect of:

- A prohibition in Low Density zones; and
- A Development Approval requirement in Low Medium Density zones

may materially reduce short stay capacity at a time when Southeast Queensland is already experiencing accommodation shortages.

This may lead to an unintended concentration of short stay accommodation into limited high intensity precincts rather than supporting balanced distribution.

## **9. Balancing Amenity and Capacity**

SCAQ believes registration and a code of conduct are appropriate and necessary. However, reforms should ensure that planning settings do not unintentionally shrink accommodation supply or undermine Brisbane's preparedness for major events, including Brisbane 2032.

We encourage Council to ensure that zoning and Development Approval requirements are proportionate, evidence based and carefully assessed for their cumulative economic and supply impacts.

A balanced approach would deliver:

- Strong registration and compliance standards
- Clear behavioural expectations and enforcement
- Sufficient accommodation capacity and geographic distribution

## 10. Conclusion

SCAQ supports the introduction of a transparent and enforceable regulatory framework for short stay accommodation.

The proposed reforms provide important safeguards for residential amenity, safety and governance within strata communities.

As Brisbane prepares for the 2032 Olympic and Paralympic Games, it is essential that regulation protects residents while ensuring the city retains sufficient accommodation capacity to support major events and visitor demand.

With thoughtful calibration of zoning and Development Approval settings, these reforms can deliver both strong community safeguards and the capacity Brisbane requires as a growing global city.

Kind regards



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