



New South Wales Government
Independent Planning Commission

TRANSCRIPT OF PROCEEDINGS

RE: BYRON SHIRE - SHORT TERM RENTAL ACCOMMODATION
PLANNING PROPOSAL (PP-2021-3351)

BRUNSWICK HEADS CHAMBER OF COMMERCE MEETING

COMMISSION PANEL: DR SHERIDAN COAKES (Panel Chair)
PROFESSOR RICHARD MACKAY AM
JULIET GRANT

OFFICE OF THE IPC: STEPHEN BARRY
OLIVER COPE

BRUNSWICK HEADS CHAMBER OF
COMMERCE: SAM PEDLOW
KIM ROSEN
RUSSELL SIWICKI

LOCATION: VIA VIDEO CONFERENCE

DATE: 1.45PM, FRIDAY, 17 FEBRUARY 2023

TRANSCRIBED AND RECORDED BY APT TRANSCRIPTIONS

DR SHERIDAN COAKES: Before we begin, I would just like to acknowledge that I'm speaking to you from Worimi Land, and I acknowledge the traditional owners of all of the country from which we virtually meet today, and pay my respects to their Elders past and present.

Welcome to the meeting today to discuss the planning proposal to reduce the number of days of non-hosted short-term rental accommodation in parts of the Byron Shire currently before the Commission for advice. My name is Dr Sheridan Coakes. I am the Chair of the Commission Panel, and I am joined by my fellow Commissioners,
10 Professor Richard Mackay and Ms Juliet Grant. We are also joined by Stephen Barry and Oliver Cope from the Office of the Independent Planning Commission.

In the interests of openness and transparency and to ensure the full capture of information, today's meeting is being recorded and a complete transcript will be produced and made available on the Commission's website.

This meeting is one part of the Commission's consideration of the matter and will form one of several sources of information upon which the Commission will base its advice. It's important for the Commissioners to ask questions of attendees to clarify
20 issues whenever it is considered appropriate. If you are asked a question and you're not in a position to answer, please feel free to take that question on notice and provide us with any additional information in writing, which we will then put up on our website. I just request that all members here today just introduce themselves formally before speaking for the first time and for all members to ensure they do not speak over the top of each other to ensure accuracy of the transcript. We will now begin.

So thank you for making time meet with us today. We did provide a brief agenda, just to - and wanted to cover, really, STRA and the Byron Bay Shire economy and how you view the importance of contribution of that. We're looking at, obviously, the
30 chamber's view on the actual planning proposal and the regulation of short-term rental accommodation in the Byron Shire, and also any other potential housing ideas and recommendations that you would like to make.

So I will hand over to you. What we will do is, I guess, as we progress through that agenda, if there's any questions, we would - if that's all right, we will jump in and ask those questions. So handing over to - is that to Kim?

MS KIM ROSEN: Or Sam? Sam is the Chair of our Holiday Letting Subcommittee. The Chamber of Commerce has lots of subcommittees, so this subcommittee has been
40 working for 15 years or something on this matter, so Sam is the current chair, so she is

going to be our conductor, and Russell and I will, you know, sort of come in at different times, so - - -

DR COAKES: Okay, lovely. All right. Over to you, then, Sam. Thank you.

MS SAM PEDLOW: Thanks. Yes. So Sam Pedlow, Chair of the Holiday Let Committee, Secretary of the Brunswick Chamber of Commerce. Where do we start, really? We sent through - we've been fighting this or supporting our holiday let owners and whatever for a very long time - I'm a tad nervous, sorry. Don't mind me.

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DR COAKES: No, no, that's fine. Take your time.

MS PEDLOW: So, you know, tourism is very important to Brunswick Heads and the north of Byron Shire, so the chamber created the Holiday Let Committee, as Kim said, quite a while ago, and because it's - we have an ethos of who we want to come to our town, and that's called Simple Pleasures, and that involves usually families or a couple of that sort of thing, as opposed to Byron's previous party reputation, I suppose. Yes. So we take it very seriously and it's very important to us to take care of our town and our locals, but also keep our businesses running, obviously, being the Chamber of Commerce.

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We put forward a submission on the 31st of October in relation to this. I've sent it through an email. I'm hoping you have a copy of that.

DR COAKES: Yes, we do. Thanks.

MS PEDLOW: It's quite in-depth. Kim spent a lot of time getting a lot of statistical data to try and show where we were coming from. So our standpoint is that basically, like, you know Bruns used to be a fishing town and then it became a tourist town, has been so for - Ross said to me yesterday a hundred years. So we need accommodation that suits our Simple Pleasures ethos, and we feel that in the past, Byron Bay itself has had a lot of problems with antisocial behaviour, all that sort of stuff, in relation to holiday and tourism, and it's not something we've ever experienced here in Bruns and in the north of the Shire. So we're a bit aghast at this whole premise, to be perfectly honest.

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MS ROSEN: Can I just say something on that one.

MS PEDLOW: Yes.

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MS ROSEN: Over the years, it started off with noise issues, which, as Sam said, we don't have, but what we find is that Byron Bay seems to take the focus, and when there's a problem, they come up with a solution to suit Byron Bay, but then we become collateral damage, and this happens in lots of different areas. And where we're very united, where we're very organised in avoiding those kinds of problems, and that's why we set out our Simple Pleasures campaign, and we work very hard with - we've got holiday managers, who are very conscientious and very respectful, and we just don't have those issues.

10 So first of all it was noise - noise and partying and rubbish, and that kind of thing, which there were no issues with, and then the last few years, it's turned around and now the issue is affordable housing. So I think that's why we're - you know, we're really concerned about it, because affordable housing has been an issue for - how long, Russell, Sam - 20 years? A long, long time.

MR RUSSELL SIWICKI: Yes. Some - - -

MS PEDLOW: I used to be on the Affordable Housing Committee of Byron Shire, and there was a lot of talk, but not a whole lot of things were done, and later on, we're
20 going to make some suggestions, but I think when we go through this, what we want to show is that this idea that holiday letting is the cause of our affordable housing problem, it's a furphy. It's just not so. There are many other causes which you'll be aware of - I mean, Brunswick Heads is not unique, it's up and down the coast. Other causes that can be addressed, other solutions that can be addressed, and in fact if the 90 days is brought in, it will be an absolute disaster for our economy, because as Sam said, we're a tourism town, we've always been a tourism town, we have no other industry. It's not as if we can pluck another industry out of the air to make up for it, and the 90 days will cause chaos. It won't achieve what people think it will achieve. We think it's kind of a social experiment, where owners will automatically swap their
30 properties over to permanent, and, Sam, I don't know if you want to speak about this a bit more, but our surveys show that they won't. It's just an assumption, and you can't make huge, life-changing economic decisions on the basis of what people might do. You need evidence. You need to base your decision on evidence.

MS ROSEN: Yes, back in - - -

MS PEDLOW: So how many, Sam? We've done our surveys. How many are going to actually swap over if the 90 days is brought in?

MS ROSEN: We surveyed all of our owners as a town, all the managing agents in town, and we've one in Brunswick Heads which would switch to a permanent, and one in New Brighton, that's it.

MS PEDLOW: So two altogether. Two, in the whole of our north of our Shire, only two, and one of those is in New Brighton, I think, isn't it, Sam?

MS ROSEN: Yes, New Brighton and one in New Brunswick.

10 MS PEDLOW: For \$2,000 a week, so it hardly would be affordable housing if it was swapped over. So - - -

MS ROSEN: Which is the case across the board with all our properties.

MS PEDLOW: Yes.

MS ROSEN: They're not affordable. They're not in places that could be deemed affordable housing.

20 MS PEDLOW: So they're going to leave them vacant, and this is our huge concern. So Russell has been involved with the Chamber for - - -

MR SIWICKI: Kim, can I just say, with the surveys we've done in the past too, not just that they won't hardly go over to affordable housing, a lot of people said they'd either close them up and keep them for their own family for holidays, or alternatively they'd sell the property. So that's where we're standing.

MS PEDLOW: That's right.

30 MR SIWICKI: And that's been done several times, with those surveys.

MS PEDLOW: And so with the Chamber of Commerce, our concern is that these properties are - so if they are allowed to do it for 90 days - and we're concerned about who's going to keep track of that, anyway - what's going to happen for the other 270 days? They're going to be left vacant. That is going to be disastrous for our economy.

MR SIWICKI: Absolutely.

40 MS PEDLOW: An absolute disaster to have - when we rely on families and visitors supporting our economy and they're suddenly not there because it's banned, then

what's going to happen to our economy? So this is - we're fighting this because we know how crucial it is. We do this in surveys every three years.

DR COAKES: Yes.

MS PEDLOW: We look at the state of our economy, we know how fragile we are - you know, we get storms, we get weather, we're vulnerable and we go down. So - - -

10 MS ROSEN: And you would have the 90 days during the peak season, so the town and the infrastructure would be huge, and then dead for the rest of the year. So, you know, and the far-reaching impacts, it's not just, you know, the local shops. It's, you know, the cleaners, the tradespeople, you know, the hospitality workers - across the whole of the northern Byron Shire.

DR COAKES: So just - so on that, Sam, so you think the assessment of the impacts on local business is that service - short-term rental accommodation have been adequately considered in the economic impact assessment?

MS PEDLOW: Do I think they have?

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DR COAKES: Yes.

MS PEDLOW: No. Certainly not. No.

MS ROSEN: No, we did our own. We did our own survey, and got our own results, and there's - we've got the exact statistics, but there's huge concerns - huge concerns of loss of trade, loss of staff, loss of jobs, and so on, but it really - I mean, the survey that was done or the economic study that was done, we have problems with it. We think it was based on very outdated - I mean, some of the data was six years old. I mean, you know, if we're going to have an economic study, it needs to be current, you know, like, really current. People need to come up, not have it done on a desktop from Sydney, and it needs to not just be using extrapolations and not including the whole of the shire. This was one of the major problems. They've only got statistics on the whole of the shire. It's very hard to get statistics on Brunswick Heads. Even the Tourism Australia statistics don't get include Brunswick Heads, that's why we do our own. But none of our own statistics that we've gathered, all these years in all of our surveys, were ever referred to. We were never consulted - never. So to - I mean, this is what we do as a chamber. We know the situation here.

40 MS PEDLOW: And the premise that before all this was happening and Byron Council was saying it was something like 5,000 properties were up for holiday letting, and - - -

MS ROSEN: 1,100.

MS PEDLOW: Registered properties - - -

MS ROSEN: Yes.

MS PEDLOW: - - - are currently on the registration. So - and, like, for me, for my business specifically, in 2017, we managed 75 holiday properties in the shire. Today
10 we manage 46.

MS ROSEN: Yes.

MS PEDLOW: So their figures are - - -

MS ROSEN: They're way off.

MS PEDLOW: We don't know where they've come from.

20 MS ROSEN: No. The numbers have actually gone down. People are saying, "Oh, yes, but there's been an explosion in the number of Airbnbs," and they refer to Airbnb as if that's the same as holiday letting, which is not - Airbnb are Stayz are just marketing platforms. We have three really conscientious property managers. That's where we think all the property should be held, because you can actually speak to them and get statistics.

You can get statistics from Airbnb. You don't even know where the properties are. It's all very - the data-gathering is all very difficult, but - yes, we're just concerned about the economic survey just wasn't - the studies just weren't good enough, and
30 they're not current enough, and we think they should really be done again. If we're really going to make such a huge decision, it's going to have such a huge impact, we know it's going to have a huge impact on the economy, and really destroy, you know, a lot of what we've worked really hard to build up over the last 20 years, then you've got to have good data. You've got to have good, reliable data, not guesswork, not "This will happen" - - -

MS PEDLOW: Assumptions.

MS ROSEN: Yes. It's not right.

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DR COAKES: Sorry to interrupt, but Richard has a question. Richard?

PROF. RICHARD MACKAY: Thank you, Chair. It's Richard Mackay speaking. Look, thank you for sharing of all of those perspectives and information with us. I'm quite interested to know whether the chamber is therefore taking the view that there should be a different precinct approach for Brunswick Heads - you know, perhaps with no caps or certainly reverting to the state-wide arrangements, or is what you're saying that the entirety of Byron Shire's proposal is wrong? In other words, just putting it very simply, are you looking for a bespoke approach for Brunswick Heads, or saying, actually, the planning proposal is not appropriate to proceed of itself?

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MS PEDLOW: We can't make educated comments in relation to the rest of the shire. We only focus on Bruns, and by extension the north of the Byron Shire. So - - -

PROF. MACKAY: Well, look, taking that onboard, and completely understand why that would be a reasonable position - - -

MS PEDLOW: Yes.

PROF. MACKAY: - - - what would you see as the appropriate regulatory
20 arrangements for short-term residential accommodation in Brunswick Heads?

MS PEDLOW: In relation to the capping alone?

PROF. MACKAY: Well, the capping is the current - - -

MS PEDLOW: Yes, the capping is the issue.

PROF. MACKAY: The capping is the current proposal for regulation, so you might -
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MS PEDLOW: Yes.

PROF. MACKAY: So you might say - - -

MS PEDLOW: We want 365.

MS ROSEN: The same as it's always been for the last hundred years, where there have not been any real issues. We've been managing it really well and it's in balance.

40 PROF. MACKAY: And - - -

MR SIWICKI: We've been in business there - sorry.

PROF. MACKAY: So you wouldn't see any - just leave it at 365, and no other regulatory mechanisms or - - -

MR SIWICKI: Not necessary.

MS ROSEN: No, but we've gone along with - we've been happy with all the fire and the - all of that, the registration, that's not an issue. We've supported that all along.
10 We've gone with everything, all of those in place. We think things need to be well managed, and our managing agents do a good job of that, and actually I would suggest that everybody should have to be with a managing agent - that's just my personal opinion - because that just gives another level of control for the community, not have individuals just doing it with Airbnb and so on, but we probably have no say in that, but, yes, just leave it as it is, 365 for Brunswick and the north of the shire.

There's no evidence to show that it needs to be any other way, because what the people who are worried about affordable housing are thinking, it won't actually work out that way. They won't get the result. In fact, we think it's going to be worse, and
20 that's another topic that we can discuss - we think the problem is going to be made actually worse if there are 90-day caps.

But just on that other point about the process, we do think the whole process hasn't been correct, so while we can't speak for Byron and other towns specifically about their needs and the economic impacts, we can sort of support them in the fact that it needed to be a much better, much more comprehensive economic study, because there were just too many bits of data that were wrong, too many decisions were made on incorrect data, and too many false assumptions, so that would apply to the whole shire. But the specifics of the capping and so on would be just Brunswick and the north of
30 the shire.

PROF. MACKAY: Yes. Thank you. That's very clear.

DR COAKES: And, Kim, just to build on Richard's question, so in terms of other types of approaches, levies and those aspects, what's the chamber's view around those sort of strategies?

MS ROSEN: Well, actually, I've been involved with tourism, I was on the Byron Shire Tourism Advisory Committee for a few years, I've been involved in affordable housing both in Randwick and in Byron in the past, and I always believe that there's
40 no one easy solution to any issue. It's usually a combination and a variety and so on,

and I think more work needs to be done to work together. I think all the different accommodation providers and various council people need to work together better, not pit one group against the other, not pit the community against the tourists and so on, because we all need each other to come to some other alternatives, and I've got a few, if you're interested in - I mean, some of them are a little bit lateral, but I don't think that matters, because I think sometimes lateral suggestions need to be explored. So do you want me to go through a couple?

DR COAKES: Yes, please.

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MS ROSEN: Okay. Well, first of all, Brunswick Heads Chamber of Commerce was instrumental in getting granny flats, or we called them garden flats, many, many years ago. We thought that was a good solution for providing enough accommodation for people who were going to live in the town and, you know, hospitality and cleaners and just workers in general to provide the right sort of variety of small accommodation and larger accommodation. So we were instrumental in getting that sorted, because we didn't want to do high-rise, so we thought garden flats, cause we had space in the gardens. It's also good because, you know, there are - we have a lot of older people, you know, living on their own, and there was space. So that was introduced, and when
20 council introduced it, they promised that those garden flats - we call them garden flats - would only be able to be used for permanent residents, not for tourists.

Now, you might think because we're a chamber and a tourism organisation, we'd want to go gung-ho, let's have tourists, but we don't, because we understand that everything has got to be kept in balance. So we said no, we have holiday lets and we have caravan parks and motels for the tourists. The garden flats must be kept sacred for permanent residents. So now they can be up to 60 square metres, so you can house, you know, a couple, even a couple with a child, in those. So that was one critical
30 thing.

Now, there's a danger at the moment. Council are at the moment not monitoring them very well, and so there's a good chance some of those are going to, you know, swap over, but if the 90-day cap is introduced and we lose our holiday accommodation that is provided through our holiday managing agents that are very well looked after, then what's going to happen? It's quite likely that people will go, "Oh, well, I'll swap my permanent one over to tourists."

MS PEDLOW: And they'll be deemed hosted, so they'll get 365 days.

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MS ROSEN: And they're hosted, and they're allowed to do it, with no qualifications, no experience. If you're hosted, you're allowed to continue doing it, while the people

who are in the business, the professionals, of managing holiday accommodation, are going to be restricted down to 90 days. It just doesn't make any sense. But that's a big concern, that we're going to lose a lot of affordable housing that we already have. So that's true, isn't it, Russ, from your - - -

MR SIWICKI: Yes.

MS ROSEN: You know that there are a lot living there. And that's been working really well, but that's a great fear. So that's one thing, is to try and ensure that council
10 can monitor the garden flats, and they said that they have to check, so if there could be any kind of State Government regulation or anything that could support so that they can't be used for tourism accommodation, the chamber would support that.

The second one is the concept of a workers' village, so those in Sydney would remember that Paddington was actually set up as a workers' - it was a workers' village, basically, to support, you know, the rest of Sydney. It's gone on to be very, very upmarket now, but we have North Byron Parklands just ten minutes up the road, perfectly positioned to have workers' village there. They have all the infrastructure for, you know, showers and toilets and things for their festivals. Their festivals only
20 occur a few times during the year. In fact, last year, when we had, you know, all the dreadful trouble with first COVID and then the floods, we were hoping that something might be able to be done quickly to set up some kind of a workers' camp there, to at least - because we were short of - we had no workers in Brunswick Heads. We thought, okay, well, we'll bring the workers, we'll invite the workers from elsewhere, and they can stay at the North Byron Parklands, and provided they've got some kind of, you know, a card or something to say they're actually a worker, at least we can look after our workers, because that is, of course, the chamber's thing to look after the businesses and the workers.

30 But I think it wouldn't be a bad idea to contact Brandon Saul, or the people that are involved with North Byron Parklands, to see if that could be a possibility, and it could be in the form of caravans or there's pods, or whatever, but that is something that could be done fairly immediately, because we've got to have short-term, medium term and long-term solutions. So that's the second one.

The third one is, for many years, I have been suggesting to people that we have all these bowling clubs that are struggling to survive all around Sydney, all around New South Wales, and when I first broached the subject with Randwick Council maybe 30
40 years ago, they said unfortunately, we can't put - what I was proposing was a second storey on top of all the bowling clubs, and maybe over-55s accommodation, because they only need a smaller space, and they would go downstairs and that would be their

recreation. And they said fantastic idea, except it's not - they're not zoned, they're zoned recreational, so unfortunately we can't do that.

10 So here's the thing - if we can think of a solution that makes sense, cannot we get the planners involved in assisting with the planning regulations to change the zoning to enable these sorts of things to happen. Now, in Byron Shire we've got the Bangalow Bowling Club, we've got the Byron Bowling Club, we've got the Brunswick Heads Bowling Club. They're all suitable to have a second storey put on top of them. Could there not be some kind of a private-public partnership? That would handle that
10 segment and provide over-55s accommodation, and would be great for the bowling club, because it would help them survive, because I think - Sam and Russ, isn't Bangalow at the moment in the throes of being taken over because they couldn't survive financially?

MR SIWICKI: Absolutely.

MS ROSEN: Okay. So here's a win-win, all right, you put a second storey on. Okay. That's the third one. Then the other one is, to round up caravans. You could get the Men's Shed to do them up. They could be new caravans or whatever, or pods. We've
20 got a lot of places that have got backyards that are not being used. See if you can match up people who are happy to have a caravan or a pod in their backyard, temporarily or three years or whatever, as a temporary or more permanent solution, and provide affordable housing then, in those. So when I've mentioned that before, of course there are issues with, "Oh, well, you've got to match people, and you've got to make sure that they're suitable," and so on, but isn't that what rental managing agents do anyway? People are put through some kind of a matching process.

30 So - and we do have a lot of elderly people, and I would imagine there'd be quite a few elderly people that would be quite happy to have a younger person in their backyard, a little bit like a woofers - you know, they could do their gardening, a bit of company, but the same principle can be applied to rooms in houses. So if people are living in larger houses, rather than forcing them to sell their houses and move out, maybe, you know, they could rent a room to a worker, a single or, you know, somebody in need.

40 So that's just an example of, there's just four ideas, but, you know, there's probably another dozen, and many permutations of those, but I just really believe that there are enough caring, smart people in the community that should be able to get together, and with the help of government resources, when you get to roadblocks, like, you know, zoning and so on, to work out some short-term, medium solutions. There's not just one solution, and the solution is certainly not just to swap it over to 90 days.

DR COAKES: And just building on that, Kim - thanks for that input, I think that's - there's some creative strategies there. In terms of the council's affordable housing and residential strategy, obviously there's been some consideration over the years of other types of housing ideas - I think land trusts and other things. Just - do you have a view on that, given, obviously, you've been involved in - - -

MS ROSEN: Well, I haven't been involved on the council's Affordable Housing Committee for many years. That was in my early time, when I came up to Brunswick.
10 I got a bit frustrated, because I like things to happen, so I turned my attention to, you know, other areas where we could actually make things happen, which we did, so - but from what I understand, there's quite a bit of work going on, looking at alternatives - you know, cooperatives and that kind of thing, and I support all of those. Any lateral - we need lateral solutions. We can't just keep doing what we've always done, you know? If the government is not going to provide affordable housing, you know, and they can't do it instantly, well, then, we'll just have to be more creative.

DR COAKES: Yes. No, thank you. Richard and Juliet, any further questions?

20 PROF. MACKAY: No, but those comments and the sort of alternative perspective has been very helpful. Thank you.

MS ROSEN: Good, thank you.

MS JULIET GRANT: Yes. No further questions from me. Thank you very much.

DR COAKES: No. Thank you. We do thank you for the effort you've put into your submission. We do have that, and thanks again for making time to meet with us today.

30 MR SIWICKI: I just hope it turns out with 365 days for Brunswick. We don't want to be slammed because there's problems in other towns. So please be aware of that. I had 42 years as a real estate agent managing properties in town here, and we never had the problems that - you hear all these problems in other high spots, you know, where the - like Byron, but we don't have them here, so please, please look very closely at it.

DR COAKES: Okay.

MS ROSEN: And you can see, for a very small town and Chamber of Commerce, we're very active. I mean, we can - we're happy to supply you all of these business
40 surveys that we've done in the past.

MR SIWICKI: Correct.

MS ROSEN: So we're willing to work together. We work together very hard to keep our, you know, visitors and residents in harmony and keep the businesses, you know, thriving, so, you know, we just hope that, yes, all that has been heard, all that data collection has been useful.

DR COAKES: Yes. Well, and I mean, on that, Kim, if you would be happy to provide us with those reports, we'd be happy to have a look at them.

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MS ROSEN: Okay. Well, you've got all the data in the submission, but how many years back would you like for the business surveys, the economic surveys? We've done them every three years since about 1999.

DR COAKES: Gosh.

MS ROSEN: That's why I say, it's really good if people who are doing reports and economic surveys and things actually speak to us, because we do have a whole lot of information that's very valuable and local and updated, so - - -

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PROF. MACKAY: Kim, it's really a matter for you as a stakeholder to determine what to put before the Commission.

MS ROSEN: Okay.

PROF. MACKAY: It's not really appropriate for us to select from your data and say, "We'll have this bit."

MS ROSEN: Okay.

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PROF. MACKAY: But what would be helpful, if you gave us a longitudinal set of information, would be to just put some front-page commentary on it that is drawing attention to the conclusions that you think it should support. In other words, like, here's our survey data, but put on the front what's the point.

MS ROSEN: Okay. I think the point I was just making was that, you know, we've followed the ups and downs, and, you know, how the economy is, you know, helped - been - got better and got worse, depending on the different things. I don't need to comment specifically on each one, but it was just more to tell you that we are really sort of up to speed with what's going on, and so we know - people say, well, how do you know that this will be a problem for you, we just know because of our years and

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years of experience, and we just know what effects - you know, what things affect the business, so - okay. Well, Sam and me can do that, but it probably won't be very extensive, will it, because it's just - the point of the business surveys is that we just keep track of the ups and downs and the impacts and so on, so - - -

MS PEDLOW: Yes, but it also will show how our businesses are impacted by tourism.

10 MS ROSEN: Definitely. No, that's true, because it's got very valuable data on the dependency on tourism, which is great, which is huge. Yes. Especially the last one.

MS PEDLOW: Should I email that through to Margaret?

MS ROSEN: Sure, but I think Richard said he wouldn't mind having a front page, so maybe we do a front - - -

DR COAKES: So as Richard stated - - -

20 MR OLIVER COPE: Oliver Cope - sorry - for the benefit of transcript. Kim and Sam, you can make written submissions to the Commission up to the 2nd of March 2023, so that's through our website.

MS PEDLOW: Okay.

MR COPE: So if you want to attach anything, you know, to that PDF, if you want to make any comments about the data, that's all helpful, but, yes, the written submissions are treated equally as the oral submissions and the meeting with the Commission that we're having now.

30 MS PEDLOW: Okay.

MR COPE: Yes, that's just through our website, but you can, you know, cc Margaret if you wish as well.

MS PEDLOW: Thank you.

DR COAKES: Okay, lovely. Well, thank you, everyone, for your time.

MR SIWICKI: Thank you for listening to us. We appreciate it.

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MS ROSEN: Yes, thank you. It's great being heard. Thank you.

MEETING CONCLUDED

[2.16pm]