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YSP Podcast Transcript: Episode 091. How WA's highest court upheld a by-law preventing short stays

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Intro: Welcome to Your Strata Property. The podcast for property owners looking for reliable, accurate, and bite-sized information from an experienced and authoritative source. To access previous episodes and useful strata tips, go to www.yourstrataproperty.com.au.

Amanda Farmer: Hello and welcome. I'm Amanda Farmer and this is Your Strata Property. Mark Atkinson is the Director of Atkinson Legal, the leading strata law firm in Western Australia. Mark has worked in strata law since 1996 and was a Founding Director of Strata Community Australia and President of SCA WA for four years. He is a Fellow and Council Member of the Australian College of Community Association Lawyers.

Now, Mark was the instructing solicitor in the recent Western Australian Ceresia River Apartments Court of Appeal case. In that case, the court upheld a by-law made by the developer of the strata scheme that Mark was acting for. This by-law effectively prohibited holiday lets. To give us his unique insight into this case, and what it means for holiday letting in strata, I am delighted to welcome Mark Atkinson. Welcome mark.

Mark Atkinson: Delighted to be here this afternoon, and thank you very much for the invite.

Amanda Farmer: Thank you for making the time. As the leading strata lawyer in Western Australia, I know you are a very busy man, so good to capture your attention for a little while.

Mark Atkinson: Yes, occasionally busy.

Amanda Farmer: Now, I've had a read of this case, Mark. I read it when it came out. I received quite a few emails about it. Members inside my online community, the YSP online community are asking questions about it, posting in the forum. "What does this mean for by-laws that attempt to restrict short-term letting?" I thought to myself, well, you're the best person to ask about that. Can I start by asking you to give us, as best you can, a short summary of the facts of the Ceresia River case?

Mark Atkinson: Sure. Delighted to. Three lots in a luxury high rise residential scheme, in Rivervale, which is the suburb close to the city. Beautiful place overlooking the Swan River. They decided to list their apartments on an Airbnb style website. It wasn't actually Airbnb, but a similar website. They did the right thing, they went to the local government and sought approval for that change of use, and got approval for that change of use.

However, the strata company had a by-law in place, in fact, this by-law had been in place from the get-go, from when the scheme was first registered, that limited the use of the lots to use as a residence, or letting to residential tenants. Now, we didn't draft the by-law. The developer did, but we did act for the strata company in the litigation.

The strata company, as part of its obligation to enforce the by-laws, went to the local State Administrative Tribunal, similar to NCAT in New South Wales, and obtained orders effectively banning this use of these lots. Mr Byrne, who was the co-owner of one of these three lots, then appealed, obtained leave to appeal and appealed to the West Australian Supreme Court.

He was unsuccessful in that appeal and he then sought and obtained further leave to appeal to the West Australian Court of Appeal, which is the highest court in Western Australia, before you go to the High Court. So, that was the last stage in this litigation, was the West Australian Court of Appeal decision. It didn't go onto the High Court.

Amanda Farmer: Okay, and we're going to get stuck into the findings and the reasons of the Court of Appeal, but before we do that, I just want to set the scene a little bit more for our listeners. So this was a by-law that required that lots be used for the purpose of a residence and for residential tenants. It actually used those words.

Mark Atkinson: Yes, that's correct.



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Amanda Farmer: It didn't say anything about short-term letting, about stays of less than three months. It didn't have anything in there about the timing?

Mark Atkinson: No, absolutely not. That became a crucial point. It didn't ban holiday letting, it wasn't a by-law that banned holiday letting. It was expressed in the positive to the effect that the use of the lot was confined to be used as a residential use, and used by or for residential tenants.

Amanda Farmer: Okay. Interestingly, Mr Byrne had the approval of the local council to use his lots for, what did the council call it?

Mark Atkinson: I think it was serviced apartments, or it might have been short stay use.

Amanda Farmer: I think you're right. I think it was serviced apartments, and then there was a definition of serviced apartments. I'm just actually looking at the case now. Independent living, residential, providing for short stay accommodation. That was the definition in the planning instrument, and he had approval from the council to operate a serviced apartment.

Mark Atkinson: Yes. The difficulty for him is that the local government requirements in Western Australia are not the only requirements he has to meet. He also has to comply with the by-laws and this case was about whether this particular by-law could restrain this use, given that the local government had approved his desired use.

Amanda Farmer: All right, so what did the Court of Appeal decide and what were their reasons?

Mark Atkinson: In essence, they dismissed the appeal. There was a slight variation to the orders, though, that had been made by the State Administrative Tribunal, and by the court below. In essence, they held that, and I'm just reading this out, use as a residence meant to use as a settled or usual abode, and this precluded occupation, *"By persons who merely used the lot as tourist accommodation, or as accommodation for holidays or other breaks away from their settled or usual abode."*

If I can just draw out an example that came out through the course of submissions in the case, the example was discussed in the courtroom about an academic who might be moving to Western Australia for employment at a university and they might not be able to obtain a house straight away, so they might desire to use an apartment like in Ceres River Apartments, for a short-term use. Might only be 6 weeks until they can find an apartment or a place in which to live more permanently.

In the view of the Court of Appeal, it's pretty clear from the discussions during the hearing and from the judgment that that sort of use, they would see as use as someone's settled or usual abode for that period of time. Even though it might only be for six weeks or so. That's not about the length of time that someone is staying in an apartment, at least not under this by-law. It is instead about whether, for that period of time that they are there, it is their settled or usual abode.

Amanda Farmer: I suppose if you think of the word residence and residential tenant, everybody, hopefully, if you're not living on the street, has a place of residence, and when I'm off in Surfers Paradise or visiting lovely Perth and I'm staying at an Airbnb, well my residence is back here in Sydney, isn't it?

Mark Atkinson: Indeed.

Amanda Farmer: It's not the apartment that I'm staying in for that week.

Mark Atkinson: That's right. It has been recognized in prior cases that someone might have two residences, however, and it's certainly not the case that you swap from one to the other automatically. It's a question of intent and facts on the ground. I mean, are you using it as your settled or usual abode? Do you intend to use it as your settled or usual abode?

So, there was certainly those in the strata community who would want to more definitively set and be able to set time limits on occupation. So by-laws that prevent someone from occupying a lot for less than three months, for example. This decision provides



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no support for that sort of a by-law, and in fact, provides support for the view that that sort of a by-law would, in fact, breach our Section 42.3 which is equivalent to your Section 139.2.

Amanda Farmer: Let's talk about that. Can we just cover off what your section 42.3 actually says, and you're right, it's substantially the same as our Section 139.2.

Mark Atkinson: Yes. It restricts or it provides that a by-law cannot operate so as to restrict or prevent, relevantly, the leasing of lots.

Amanda Farmer: And as I read the case, Mr. Byrne's lawyers tried to argue that this by-law did indeed do that, and therefore fell foul of Section 42.3.

Mark Atkinson: And we had tried to run, as a firm, a similar argument to the argument that Mr. Byrne was running, and we tried to run that argument 10 years ago in a case here, which went just before the State Administrative Tribunal, and we were unsuccessful in that argument that the effect of the by-law was to make it impossible, practically impossible, to lease a lot.

The member in that other case decided, "No, that's not what it's about" and the Court of Appeal really confirmed that here. Yes, it may restrict the marketability of a lot, but that doesn't mean that the by-law itself is restricting the letting of a lot in the sense intended by Section 42.3.

Amanda Farmer: I suppose it's restricting the way the lot can be used, it's not restricting the fact that the lot can be leased. All right. Now, with very similar legislation here in New South Wales, do you think this decision is going to impact the interpretation of similar by-laws in New South Wales?

Mark Atkinson: Well, I'm not qualified to advise about New South Wales law. I'm only admitted to practice in Western Australia. My personal view is yes it should. The West Australian Court of Appeal took into account at our request, decisions of the New South Wales courts in considering how to construe the by-law. There's a decision with Grain Corp Operations Limited, on Liverpool Plains Shire Council, about the meaning of residence.

It also followed some earlier New South Wales Court of Appeal decisions. The Hamlena case and Bapson and Salerno cases as well. So, the Court of Appeal decision with the benefit of some very good advocacy by the lawyers on each side did a pretty comprehensive review of similar cases around Australia, and also relevant cases from the UK as well.

So, if you have legislation in New South Wales that is in similar terms of Section 42.3, and Section 42.1, about the topics that a by-law can cover off, then I would see that it would have an impact on the construction of similar by-laws in New South Wales.

However, I note that there has been a subsequent decision of your NCAT to the contrary. I've read the case, I can't see the text of the by-law in the case. I can't see whether the Ceresa River Apartments decision was cited to it, or whether they were aware of it. So, it is settled I think by this decision in Western Australia, but there's clearly some still working out to happen in New South Wales as yet.

Amanda Farmer: Just for the benefit of our listeners, the New South Wales NCAT case that Mark's talking about is called Estens and I'll put a link to it in the show notes so you can go and read it. I do actually have the text of the by-law inside my members-only forum. Very kindly, one of my members tracked that down and posted it, and then asked me what I thought about it. Look, it's a different by-law to what you saw in Ceresa River, it's a different by-law to what I've seen produced by other lawyers, and what I would produce under instructions, and there were a number of problems with it. The reasoning in the case is difficult to grasp. There are references not to Ceresa River, but to Fair Trading advice and things that we wouldn't usually think as lawyers would be binding legal instruments or any case law.

I don't know if there will be an appeal. Neither party was represented in that case. I think that perhaps each party's been approached by lawyers since saying, "Hey, let me help you out and try to clear some of the air surrounding this case now" but no,

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doesn't have the same status as Ceresia River will have, and we're looking forward to a decision from a superior court that will give us a bit more guidance and I agree with you, Mark. I think Ceresia River will be very persuasive in that respect.

I want to talk about the role of the council here and planning instruments and planning authorities. Going back to your case, Mr. Byrne had the approval of the council to operate his lots as serviced apartments, and it is set out in the judgment that one of the conditions of that approval was that Mr Byrne go and seek the consent of the strata company, which he, I don't know whether he did or not, but the by-law existed so that wasn't going to happen.

I find that a bit hard to grapple with. What we see there is the ability of a strata scheme to in effect, overrule the Planning Authority. What are your thoughts on that?

Mark Atkinson: Well, my thoughts as a lawyer in relation to this case are that it's been settled law for some time in Western Australia that by-laws can regulate uses in a way similar to but not necessarily the same as the control of uses by local governments, under local planning schemes. So, what I've discussed before at ACCAL presentations is that in Western Australia, we essentially have or could have twin track planning controls.

So, you could have a planning control, you do have planning controls imposed by a local planning scheme or the like, and you also have defacto planning controls imposed by by-laws made by strata schemes or made for strata schemes on registration. Now, that would appear to be even more so the case now with Ceresia River Apartments being an authoritative decision.

Whether that's a good thing or not is not really for me to say. Certainly, I don't believe that it would be good for planning to be conducted by strata schemes on a broad scale across Western Australia. Cathy Sherry's book makes that argument pretty strongly I think, and pretty clearly. Part of the difficulty also here is just the lack of understanding by those in the planning sector about the role of strata and the role of strata by-laws.

In fact, from recollection, it wasn't a condition of the development approval that Mr Byrne and others obtain the consent of the strata company. It was simply a request or an advice note that they should do so. But some of the difficulties stem from the differences and definitions between residence in the local planning scheme, and residence for the purposes of these particular by-laws.

Across Perth and across Western Australia, the local planning schemes, unfortunately, do differ. There's model texts, but it's not always adopted. They haven't with respect always kept up to date with the introduction of Airbnb and other similar websites, and the use made of apartments under that.

So look, I think there's some problems there with definitions in the planning controls, and in a part, that then leads to strata schemes attempting to control the use made of lots, when really, ideally, it would be a matter solely dealt with by the local government in a proper fashion.

Amanda Farmer: I draw a distinction when it comes to development approvals where the council has allowed, and I've been in this kind of a case, where a council has allowed a lot owner to carry out work. In this case, it was to deal with a ceiling that was within a commercial property, and the council for whatever reason, they needed council approval to do what they wanted to do. The council said they could do it, but one of the conditions of the consent was that they obtain the consent of the owner's corporation.

There was a reference to the relevant section in the strata scheme's management act that says, "If you are going to add to, alter the common property, you need a special resolution and probably a by-law." Now, I separate that from a position where the local council may say, "You can use your apartment for serviced apartments or short stay accommodation, but just go and check with your owner's corporation first if that's okay, because they might have a by-law, they might decide they don't like it."

I'm a little bit more uncomfortable with that, and we do have a section in our legislation here, I'm not sure if you have the same, that a by-law must not be contrary to the act or contrary to any other law.

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Mark Atkinson: Yes. There's not a requirement at the time when you're making the by-law that that be the case, but certainly it's one of the grounds on which you can challenge a by-law is that it is contrary to the act, or any other requirement that ought to have been observed, which would presumably include any other statutory requirement.

Amanda Farmer: Correct me if I'm wrong, but in Ceresa River there was no challenge to the validity of the by-law.

Mark Atkinson: No. No, no, and curiously so.

Amanda Farmer: So it was about what the by-law meant, what the term residence meant, not whether we would even make a by-law that attempted to restrict in that way.

Mark Atkinson: It was about that in a sense that the challenge was made relying on Section 42.3 of our local strata act, that it restricted the letting of lots. A challenge was also made that based on the Residential Tenancies Act that the meaning of the word residence in this particular by-law was not the one for which we contended. But there was no challenge ever mounted to the validity of this by-law under the section that would have allowed for such a challenge. I don't know frankly what would have happened had such a challenge been mounted, but it wasn't.

Amanda Farmer: Yes, okay. So, here is the million dollar question, perhaps more for some people. What are you now recommending to buildings who want to use by-laws to prohibit short-term letting in their buildings?

Mark Atkinson: Okay, West Australian only, I need to stress, because it's settled in Western Australia, but not settled elsewhere. In Western Australia, my position is perhaps thought to be a little unusual but do not ban short stay letting, because if you try to ban letting for less than three months, it will likely be held to be invalid.

But that's not the only reason why I think controls on short stay letting schemes can be problematic. More generally, I am recommending to owners that they act cautiously and only act after being armed with knowledge. The Ceresa River Apartments litigation cost each side a very large sum of money, and theoretically, it could have gone further on to the High Court had Mr Byrne been so minded.

So, although my client was ultimately successful in obtaining the order that it sought, preventing this particular use, it only achieved that after litigation extending over some years, and at great cost. And also great cost to relations within the scheme, at least with Mr Byrne and others. So, in my advice to schemes now, as I say, act cautiously and only act after you're armed with knowledge.

When people come to seek my advice about this issue, I ask them to understand the local planning scheme, to obtain the development approval that applies to see what controls already exist. They may not have thought of them. I'm recommending that they negotiate with owners who wish to use Airbnb to see whether there's some voluntary controls could be imposed without the need for a by-law to be made.

If you do want to make a by-law controlling this use, rather than banning it, then there are a lot of things that can typically be done which are fleshed out after discussions with the scheme. So, improved internal security, internal reporting is improved, internal compliance measures, or maybe even adopting a by-law that increases the levies for these owners after a complaint is received about noise or nuisance, for example.

You could introduce a ban if there's a certain number of complaints in a 12 month period or the like. There are a lot of ways to achieve the desired outcome of minimizing the noise and nuisance impacts short of banning holiday or short stay letting. Also, I think owners considering a by-law or by-laws need to consider what might happen with holiday lettings in the future. Both for themselves personally and the use of their own apartments, but also more generally.

I mean, I understand Airbnb has elsewhere been controlled by government legislation. You need to consider if that's going to happen in your jurisdiction, and Airbnb itself, as I understand, or has introduced or is introducing a form of sharing of income with strata companies and strata schemes. So, the number one bit of advice that I'm conveying to people is please do not ban short stay letting, but more generally, act cautiously and be armed with knowledge about options and what can be done.

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strata companies and strata schemes. So, the number one bit of advice that I'm conveying to people is please do not ban short stay letting, but more generally, act cautiously and be armed with knowledge about options and what can be done.

Amanda Farmer: And don't cut and paste the Ceresa River by-law.

Mark Atkinson: Look, please do not blindly copy it as I've said. This outcome, for this scheme, was certainly a good one ultimately, but it came at a great financial cost for everyone, and also at the cost of some relations within the scheme. Please do not blindly copy it.

Amanda Farmer: I really like that idea of regulating the impact rather than the activity, and we've seen that over the years with pets, and it seems a tiny example, but for many years I think it's gone unquestioned that if you want to ban pets in your building, you ban pets in your building. But we're seeing that way of thinking change, particularly with the new legislation here in New South Wales that has removed that option as the default option in the model by-laws.

Instead, there is greater information and education I think out there, and advocates for permitting pets, but regulating the impact those pets have, noise, mess, disturbance, which just makes sense. I do think Airbnb and the like are here to stay, and we will be moving closer towards that method of regulation.

Mark Atkinson: And noting also in Western Australia, we benefit from currently having flexible legislation, so it is relatively easily done in Western Australia, in legal terms, to introduce a by-law that allocates the levies in a way that's fairer, taking account of the use made of the common property, or noise and nuisance problems and security costs, et cetera. In Western Australia, we benefit from being able to alter the by-laws around that, which can then impact the decision of an owner about whether they're going to put a rugby team into their apartment every weekend when it's going to cost them a lot of money in strata levies and angst. It will change that decision.

Amanda Farmer: Yes, that's a good point to make, because we don't have that level of flexibility here in New South Wales, and it's something that perhaps our legislators need to be thinking about.

Mark Atkinson: Yes, absolutely.

Amanda Farmer: Okay. Well, thank you so much for very clearly and articulately relaying the outcome and the reasoning in that case, Mark. I'm sure that's really helpful for a lot of our listeners, and I'm sure there'll also be more questions out there that will be coming through to me, so I might be flicking those ones off to you. Expect a few emails. The book question. What books have had the greatest impact on you and why?

Mark Atkinson: Okay, well I'd have to say the Strata Titles Act, because I've been working in this space for 21 years, and I've read that particular "book" more often than any others. I'm going to be reading a new one because it will be a new act being introduced, so I'll be doing some more reading of that. But going back to law school, one book that I always loved was Hart and Honoré's book on causation, and the key takeaway for me in that book has always been that every gift that's made demands a gift in return.

So, if the granny turns up at Christmas unexpectedly with a gift for you, what's the first thing you think? It's not, "*Oh, thank you very much granny.*"

Amanda Farmer: It's, "Oh crap."

Mark Atkinson: It's actually, "Oh, my God. I haven't got a gift for granny. I forgot granny." Glissan's book on cross examination as well, too. I think it's a fabulously written book about how to better cross-examine. More recently, Cathy Sherry's book on governance in strata schemes and property rights. I've read that with great interest.

Amanda Farmer: It's a good one.

Mark Atkinson: And it has certainly influenced my thinking and thinking of others in the firm.

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Amanda Farmer: Yes, I've taken to quoting Cathy sometimes to opponents of mine who like to tell me, "You can't have a by-law about this. You can't have a by-law about that." I say well, "Have a look at what one of our most esteemed academics is writing here in New South Wales about all the kinds of things you can have by-laws about." Strata is an anathema to property law as Cathy likes to say.

Mark Atkinson: Yes, indeed.

Amanda Farmer: All right, now Mark, how do our listeners find out more about you and is there anything you want to add before we wrap up?

Mark Atkinson: Okay, so look, if the listeners are themselves, lawyers, then I encourage them to sign up to membership of the Australian College of Community Associations Lawyers, known as ACCAL, and come to our next conference in Melbourne. It's a fabulous event, a lot of very fun people like yourself and myself, and many others. If there's strata owners in Western Australia, then please sign up to membership of Strata Community Australia WA, and attend one of the events.

If I'm not speaking, I'm usually at the event, and always happy to talk to owners. And also, if people do want to arm themselves with some more knowledge, then more generally look up the Western Australia tribunal database. It's a fabulous resource for understanding more about the law in this area. I recommend people would do that.

The one thing I'd like to say again, I know I've already said it, please do not blindly copy the by-law in Ceresia River Apartments. Please do not do that.

Amanda Farmer: That's it. Well, I'll make sure there are links to ACCAL, to WASCA, and the WA Tribunal in the show notes for the episode so our listeners can check all of that out. Thanks so much, Mark.

Mark Atkinson: Been a pleasure.

Amanda Farmer: Catch you next time.

Mark Atkinson: Okay.

Outro: Thank you for listening to Your Strata Property, the podcast which consistently delivers to property owners reliable and accurate information about their strata property. You can access all the information below this episode via the show notes at www.YourStrataProperty.com.au. You can also ask questions in the comments sections, which Amanda will answer in her upcoming episodes. How can Amanda help you today?



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