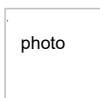


From: [REDACTED]
To: [Representation](#)
Cc: [REDACTED]
Subject: Representation on behalf of the Short Term Accommodation Association Australia (STAAA) - Draft Amendment PSA-25-3 to Tasmanian Planning Scheme - Hobart.
Date: Friday, 24 July 2026 9:01:09 AM
Attachments: [STAAA HCC Representation PSA-25-3 dated 24.047.2026.pdf](#)

Dear Mr Stretton

Please find attached our Representation on behalf of the Short Term Accommodation Association Australia (STAAA) in respect of the proposed Draft Amendment PSA-25-3 to Tasmanian Planning Scheme - Hobart.

Kind regards



Keiran Craig-Jones (she/her)
Executive Director, Short Term Accommodation Association Australia (STAAA)

1300 349 206 | +61 [REDACTED] | staaa.org.au

[REDACTED] | PO Box 3049, Newmarket QLD 4051

Book a Meeting: <https://calendly.com/staaa>

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From: [REDACTED]
Sent: Thursday, 2 July 2026 8:00 AM
To: [REDACTED]
Cc: [REDACTED] ; Office of the CEO – City of Hobart ; [REDACTED]
Subject: Re: Stakeholder Confirmation - Visitor Accommodation Planning Amendments
Importance: High

Hi Jen

Many thanks for confirming that the statutory notice requirements have been met.

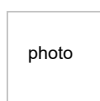
To clarify the concern raised in my earlier email, is not about whether the general public notification requirements were satisfied. It relates specifically to the assurance given by Karen Abey via her email on the 17 June 2026, in which she confirmed she would notify us directly once the public consultation link became available. STAAA relied on that assurance rather than independently monitoring the Have Your Say page or newspaper notices, which is why the twelve day gap between the consultation opening and our being notified is of a significant concern to us.

I would also note that this is not an isolated instance. Over the past several years, STAAA has sent correspondence to Hobart City Council, including directly to the Office of the CEO, on a number of occasions and majority of these have gone without acknowledgement or reply. Given this pattern, the delay in notifying us on this occasion reinforces a broader concern we hold about the consistency of Council's engagement with STAAA as a key industry stakeholder in matters affecting the short-term rental accommodation (STRA) industry. Beyond STAAA's own submission, our concern extends to our members. A number of our STAAA members own and operate STRA properties within the Hobart local government area and could potentially be directly affected by this amendment. It is of course extremely important that these individual owners and operators, many of whom would not otherwise have known the consultation had opened, are given a fair and genuine opportunity to prepare and lodge their own written representations before the closing date.

On the question of timeframe, given that STAAA has effectively had access to the consultation link for a shorter period than the full 28 days originally anticipated, we would appreciate Council's consideration of an extension, both to allow STAAA to prepare a properly considered submission and to give our potentially affected members adequate time to lodge their own representations. If an extension is not possible, please confirm via return email.

I look forward to receiving your urgent response.

Kind regards



Keiran Craig-Jones (she/her)
Executive Director, Short Term Accommodation Association Australia (STAAA)

1300 349 206 | +61 [REDACTED] | staaa.org.au

[REDACTED] | PO Box 3049, Newmarket QLD 4051

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From: [REDACTED]

Sent: Wednesday, 1 July 2026 3:05 PM

To: [REDACTED]; [REDACTED]

Cc: [REDACTED]; Office of the CEO – City of Hobart; [REDACTED]

Subject: RE: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Hi Keiran,

Given the statutory nature of the PSA, we have ensured that all due processes have been followed, including publishing newspaper notices to advise of the commencement of the public exhibition and ensuring the PSA is available on our website and at customer service.

There is still two weeks remaining for submissions. Please let us know if you anticipate any issues with this timeframe for the STAAA to prepare and lodge a submission.

Regards,

Jen



Jennifer Lawley She/Her

Manager Strategic Land Use Planning

P [03 6238 2496](tel:0362382496)

[REDACTED]

E [REDACTED]

W hobartcity.com.au

From: [REDACTED]

Sent: Wednesday, 1 July 2026 2:27 PM

To: Jen [REDACTED]

Cc: [REDACTED] Office of the CEO – City of Hobart; [REDACTED]

Subject: Re: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Hi Jen

Many thanks for emailing through the link to the public consultation.

I note that the consultation opened on Friday 19 June 2026 and is scheduled to close on Thursday 16 July 2026.

As you will be aware, today is the 1 July 2026, which is almost two weeks since the public consultation period commenced, yet we have only today been notified by you and provided with the consultation link.

Could you please explain why we were not informed on the 19 June that the consultation had opened?

In particular, I refer to my below email correspondence of the Wednesday, 17 June 2026, in which Karen Abey confirmed that she would notify us once the public consultation link became available.

Given that assurance, I am frankly shocked that we were not notified when the consultation commenced on Friday 19 June 2026.

In the circumstances, I would appreciate an urgent explanation as to why this did not occur.

I look forward to your prompt response.

Kind regards

photo



Keiran Craig-Jones (she/her)

Executive Director, Short Term Accommodation Association Australia (STAAA)

1300 349 206 | +61 [REDACTED] | staaa.org.au

[REDACTED] | PO.Box.3049.Newmarket.QLD.4051

Book a Meeting: <https://calendly.com/staaa>

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From: Jennifer Lawley [REDACTED]
Sent: Wednesday, 1 July 2026 2:09 PM
To: Keiran Craig-Jones [REDACTED] Karen Abey [REDACTED]
Cc: Short Term Accommodation Association Australia (STAAA) [REDACTED]
Subject: RE: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Hi Keiran,

The PSA is now on exhibition. Here is the link: <https://www.hobartcity.com.au/Development-and-Business/Recent-development-activity/Current-Planning-Scheme-amendments>

Representations must be submitted:

- by email to representation@hobartcity.com.au (please note that representations sent to any other email address will not be accepted) OR
- in writing to the Chief Executive Officer, GPO Box 503, Hobart TAS 7001 OR
- hand-delivered during office hours to the Customer Service Centre, 16 Elizabeth Street, Hobart.

Warm regards,
Jen



Jennifer Lawley She/Her

Manager Strategic Land Use Planning

P [03 6238 2496](tel:0362382496)

M [REDACTED]

E [REDACTED]

W hobartcity.com.au

From: Keiran Craig-Jones [REDACTED]
Sent: Wednesday, 1 July 2026 1:30 PM
To: Karen Abey [REDACTED] Jennifer Lawley [REDACTED]
Cc: Short Term Accommodation Association Australia (STAAA) [REDACTED]
Subject: Re: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Hi Karen

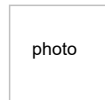
I hope you are well.

I just wanted to follow up in respect of our below email correspondence of the 17 June 2026.

Are you please able to provide me with an update in respect of when you anticipate for the Have Your Say link in respect of this proposed amendment to go live please?

I look forward to hearing back from you.

Kind regards



Keiran Craig-Jones (she/her)
Executive Director, Short Term Accommodation Association Australia (STAAA)

1300 349 206 | +61 [REDACTED] staaa.org.au

[REDACTED] | PO Box 3049, Newmarket QLD 4051

Book a Meeting: <https://calendly.com/staaa>

From: Karen Abey [REDACTED]
Sent: Wednesday, 17 June 2026 12:24 PM
To: Keiran Craig-Jones [REDACTED]
Subject: RE: Stakeholder Confirmation - Visitor Accommodation Planning Amendments
Correct - thanks



Karen Abey

Director Strategic and Regulatory Services Network

P [REDACTED]

E [REDACTED]

W hobartcity.com.au

From: Keiran Craig-Jones [REDACTED]
Sent: Wednesday, 17 June 2026 12:23 PM
To: Karen Abey [REDACTED]
Cc: Jennifer Lawley [REDACTED]
Subject: Re: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Thanks Karen, we really appreciate that you will notify us once the public consultation link is available.
Can you please confirm that the 28 days will only commence from the date the public consultation link is available?
Kind regards



Keiran Craig-Jones (she/her)
Executive Director, Short Term Accommodation Association Australia
(STAAA)

1300 349 206 | [REDACTED] | staaa.org.au

[REDACTED] | PO Box 3049, Newmarket QLD 4051

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[image.png](#)

On 17 Jun 2026, at 11:45 am, Karen Abey [REDACTED] wrote:

Hi Keiran,
We haven't started the process yet but can let you know once we do.
Thanks,
Karen

Karen Abey

Director Strategic and Regulatory Services Network

P [REDACTED]
E [REDACTED]
W hobartcity.com.au

From: Keiran Craig-Jones [REDACTED]
Sent: Wednesday, 17 June 2026 12:11 PM
To: Karen Abey [REDACTED]
Cc: Jennifer Lawley [REDACTED]
Subject: Re: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Hi Karen
Can you please forward me the public available link to this HCC consultation please?
I've had a look on the HCC Have Your Say page, however, I cannot locate this specific consultation in respect of Short-Term Rental Accommodation (STRA)/visitor accommodation.
Kind regards

Keiran Craig-Jones (she/her)
Executive Director, Short Term Accommodation Association Australia
(STAAA)

1300 349 206 | +61 [REDACTED] | staaa.org.au

[REDACTED] | PO Box 3049, Newmarket QLD 4051

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On 8 Jun 2026, at 2:10 pm, Dannielle Campbell [REDACTED] wrote:

FYI

Kind regards

<~WRD0002.jpg>

Dannielle Campbell
Tasmania Board Member
Short Term Accommodation Association Australia (STAAA)

Phone: 1300 349 206
Mobile: [REDACTED]
Website: <https://staaa.org.au>
Email: [REDACTED]

[STAAA Upcoming Events](#)
[STRA Summit 2027](#), 9-11 March 2027, Adelaide

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From: Karen Abey [REDACTED]
Sent: Friday, June 5, 2026 1:12 PM
To: Dannielle Campbell [REDACTED]
Cc: Jennifer Lawley [REDACTED]
Subject: RE: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Dear Dannielle,

Our proposed planning scheme amendments are now published via our agenda for the Planning Authority Committee meeting on 10 June. You can see the agenda [here](#).

It may be possible for you to make a deputation at the meeting. See further information [here](#).

If the proposed amendment is supported by the Committee, there will be a further public consultation process that you can also participate in.

Regards,
Karen

Karen Abey

Director Strategic and Regulatory Services Network

P [REDACTED]
E [REDACTED]
W hobartcity.com.au

From: Dannielle Campbell [REDACTED]
Sent: Tuesday, 2 June 2026 4:35 PM
To: CoH Mail [REDACTED]
Cc: Liz Wilson [REDACTED]
Subject: Stakeholder Confirmation - Visitor Accommodation Planning Amendments

Dear HCC Planning Department,

I write on behalf of the Short Term Accommodation Association Australia (STAAA), the national peak industry body representing short-term rental accommodation (STRA) owners, operators, and property managers across Australia.

It has recently been brought to our attention that Hobart City Council may be considering amendments to existing planning provisions relating to visitor accommodation. While we appreciate that any proposal of this nature will be at an early stage, STAAA is interested in engaging with Council constructively as these matters develop.

We write to formally request confirmation of the following:

1. That STAAA is recorded on Council's stakeholder register as a key industry body for matters relating to visitor accommodation and short-term rental accommodation (STRA); and
2. That STAAA will be included in any consultation process should amendments to relevant planning provisions be progressed.

STAAA has a demonstrated record of productive engagement with planning and regulatory processes at local, state, and federal levels. We are committed to evidence based policy and would welcome the opportunity to contribute meaningfully to any review.

If STAAA is not currently listed as a stakeholder, we would be grateful if you could arrange for our details to be added to Council's records. I am happy to provide any further information required.

Please do not hesitate to contact me should you wish to discuss and I look forward to hearing back from some at HCC with confirmation in respect of the above.

Kind regards

<~WRD0002.jpg>

Dannielle Campbell
Tasmania Board Member
Short Term Accommodation Association Australia (STAAA)

Phone: 1300 349 206

Mobile: [REDACTED]

Website: <https://staaa.org.au>

Email: [REDACTED]

[STAAA Upcoming Events](#)
[STRA Summit 2027](#), 9-11 March 2027, Adelaide

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Thank you.



REPRESENTATION

Dated: 24 July 2026

**Draft Amendment PSA-25-3: HOB-S11.0
Hobart Visitor Accommodation Specific Area Plan**

1. About STAAA and the basis of this representation

The Short Term Accommodation Association Australia (STAAA) is the national peak body representing short-term rental accommodation (STRA) owners, operators and property managers across Australia. STAAA's work focuses on education, advocacy, regulation and collaboration across the STRA industry, however, it is important to note, that we do not represent international booking platforms such as Airbnb, Booking.com or Expedia.

STAAA makes this representation in opposition to draft amendment PSA-25-3, which seeks to insert a new Specific Area Plan, HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan, into the Hobart Local Provisions Schedule.

STAAA's objection is regarding the absence of any genuine evidentiary basis demonstrating an adverse impact on residential amenity, which, on STAAA's understanding of the statutory framework and the Tasmanian Planning Commission's established practice, is a central requirement for an amendment of this nature to be capable of being supported through the Tasmanian Planning Commission's (TPC) assessment process.

2. Procedural concern: Failure to notify STAAA despite specific requests

STAAA wrote to Council on 2 June 2026 requesting formal registration as a stakeholder in respect of visitor accommodation and STRA matters and confirmation that STAAA would be included in any consultation process should amendments to the relevant planning provisions be progressed. Council's Director Strategic and Regulatory Services Network, Karen Abey, responded on 5 June 2026 confirming that, should the draft amendment be supported by the Planning Authority Committee, *"there will be a further public consultation process that you can also participate in."*

On 17 June 2026, having been unable to locate any public consultation material on Council's Have Your Say page, STAAA wrote to Council again (Karen Abey and CC to Jennifer Lawley), directly requesting the consultation link. Karen Abey's response was *"We haven't started the process yet but can let you know once we do."*

We responded to Karen Abey on the 17 June *"Thanks Karen, we really appreciate that you will notify us once the public consultation link is available."*

Can you please confirm that the 28 days will only commence from the date the public consultation link is available?"

We received a response from Karen Abey on the 17 June, *"Correct - thanks"*

The exhibition period in fact commenced two days later, on 19 June 2026. Council did not notify STAAA when this occurred.

This matter is raised to place on record that, despite specific written requests for inclusion and an explicit assurance of notification from Council (Karen Abey, Director Strategic and Regulatory Services Network), this notification was not provided.

On the 1 July 2026, after speaking with the Tasmania Planning Commission, we emailed Karen Abey and Jennifer Lawley with the following:

Hi Karen

I hope you are well.

I just wanted to follow up in respect of our below email correspondence of the 17 June 2026.

Are you please able to provide me with an update in respect of when you anticipate for the Have Your Say link in respect of this proposed amendment to go live please?

I look forward to hearing back from you.

Council's Manager Strategic Land Use Planning, Jennifer Lawley wrote to STAAA acknowledging that statutory public notice requirements had been met through newspaper advertising and publication on Council's website. STAAA's response on 1 July 2026 maintained that the concern was not about general statutory notice but about the specific direct notification assurance given by Council's Director Strategic and Regulatory Services Network, Karen Abey on the 17 June 2026 and noted a broader pattern of Council correspondence to STAAA going without acknowledgement or reply over a number of years.

In a further response received on 2 July 2026, Council's Manager Strategic Land Use Planning, Jennifer Lawley acknowledged the delay in notification and offered STAAA and its members an extension of the representation period to Friday 24 July 2026. STAAA welcomes this acknowledgment and the extension. The extension confirms the substance of the concern raised, that STAAA's effective access to the consultation period was shorter than the full exhibition period and that Council's own conduct contributed to that gap. The extension also reflects the practical reality that STAAA members who are directly affected by the proposed amendment and who would not otherwise have known the consultation had opened, require adequate time to lodge their own representations.

This procedural history is relevant to Council's consideration of the adequacy of stakeholder engagement in respect of this amendment and is placed on record for the purposes of any report Council is required to prepare on representations received.

3. Substantive concern: Absence of evidence of adverse impact on residential amenity

3.1 The relevant statutory and policy context

Section 32(4) of the Land Use Planning and Approvals Act 1993 (LUPA Act) sets a deliberately narrow test for the inclusion of a Specific Area Plan (SAP) in a Local Provisions Schedule. An SAP may only be included where the relevant use or development is of significant social, economic or environmental benefit, or where the area of land has particular environmental, economic, social or spatial qualities that require provisions unique to that area. This narrow test is acknowledged in the Era Advisory report itself in its assessment against section 34(2)(b) of the LUPA Act.

In its 2018 report on draft Planning Directive No. 6, which established the visitor accommodation provisions that the current draft amendment now seeks to substitute, the Tasmanian Planning Commission (TPC) treated residential amenity as a distinct head of assessment, separate from housing affordability. The Commission found that certain categories of visitor accommodation within existing dwellings may have various degrees of impact on residential areas, and specifically identified that visitor accommodation in dwellings where the owner was permanently absent was more likely to impact on residential amenity than other categories. This establishes that the Commission, in its own prior consideration of this exact planning matter, assesses amenity impact as a discrete question requiring its own evidentiary foundation, not as something that follows automatically from a finding on housing supply or affordability.

By contrast, in the same report the Commission found that the housing affordability case advanced at that time was itself supported by limited evidence and data, and that in the absence of reliable data it was difficult to measure the actual impact of visitor accommodation on housing affordability. This underscores the importance of Council, in seeking to rely on a housing affordability rationale for a much more restrictive amendment than that considered in 2018, ensuring its evidence base is robust, and separately ensuring that any amenity-based justification for the amendment is supported by its own dedicated evidence, consistent with the Commission's established approach.

STAAA's review of the documents published in support of draft amendment PSA-25-3, being the Era Advisory report dated 1 April 2026, the report of Professor Peter Phibbs and the SGS Economics and Planning Cost Benefit Analysis, indicates that no such evidence base has been compiled or relied upon.

3.2 The supporting documentation does not evidence amenity impact

The primary purpose stated for the draft amendment, as set out in the Era Advisory report, is to limit the impact of whole dwelling visitor accommodation on the availability and affordability of housing for long-term residents. The entirety of the evidentiary case assembled by Council's consultants, being rental bond and median rent data, vacancy rate analysis, visitor accommodation permit statistics and the cost benefit modelling prepared by SGS, addresses housing supply and affordability. None of it is amenity evidence.

Where amenity is addressed, Council's own consultants concede the absence of supporting evidence. The SGS Cost Benefit Analysis states in terms that amenity impacts associated with short stay accommodation, such as noise and reduced neighbourhood cohesion, "are acknowledged in the analysis but are not monetised due to limitations in the available evidence," and that these impacts are "instead considered qualitatively." No complaints data, compliance data or any other empirical record of amenity harm, such as noise complaints, parking disputes or waste management issues attributable to visitor accommodation, is identified anywhere in the supporting documentation.

Notwithstanding this absence of evidence, the Era Advisory report's assessment against section 34(2)(b) of the Land Use Planning and Approvals Act 1993 asserts, without any supporting citation, that the draft amendment "improves housing availability and affordability, protects residential amenity, and reduces longer-term costs associated with sprawl and infrastructure provision." This assertion of an amenity benefit is not supported by any amenity specific evidence and appears to rest entirely on the housing affordability case rather than on any independent assessment of amenity impact.

This is a material deficiency. An amendment of this nature, which removes an existing permitted pathway for a lawful land use across an entire category of residential zones, ought to be supported by a clear evidentiary record demonstrating the harm it is intended to address, particularly where, as here, the planning instrument being relied upon (the Specific Area Plan mechanism) is a planning tool and the assessment criteria under the Tasmanian Planning Policies for Tourism require that visitor accommodation be managed so that it does not significantly impact housing supply, alongside separate strategic planning provisions addressing amenity, character and streetscape. Housing affordability outcomes, however framed, cannot substitute for the amenity evidence that this kind of planning control is intended to be assessed against.

3.3 The data relied upon does not establish the housing loss narrative either

Without resiling from the amenity point above, that the housing affordability case itself is contested by data available to STAAA. Tasmanian rental bond data indicates that the number of active rental bonds in the Hobart local government area have in fact increased from the period 2016 to 2026, which is inconsistent with the proposition that short-stay accommodation has materially reduced the long-term rental pool in Hobart over that period. This data should be tested by Council and, in due course, the Commission against the conclusions drawn from the report of Professor Phibbs.

The report of Professor Phibbs, relied upon extensively throughout the Era Advisory report and the SGS analysis, raises material questions of independence that Council is required to address. In an article published in *The Conversation* on 3 July 2026 and reproduced by *Mirage News* titled '[Tighter Short-Stay Rules: Boost for Long-Term Market?](#)', Professor Phibbs disclosed the following interests under *The Conversation's* mandatory author disclosure policy: that he has received funding from Shelter Tasmania, Hobart City Council and the Australian Housing and Urban Research Institute (AHURI) to undertake research on short-term rentals; and that he is a board member of the Housing Data Justice Lab in the USA, which produces the website *Inside Airbnb*.

These are publicly declared interests. Their significance for the reliability of the evidence base before Council is substantial. Council has relied on research produced by a person who received direct funding from Hobart City Council itself for STRA research. This means HCC is both the funder of Professor Phibbs' STRA research and the body now relying on that research to justify a major planning amendment. That relationship ought to have been disclosed in the Era Advisory report. It was not. Council should address whether Professor Phibbs' report was independently commissioned or was informed by any prior engagement or funding arrangement with Council and how Council has satisfied itself that the research it relies upon was conducted independently of that funding relationship.

Professor Phibbs' board membership of the Housing Data Justice Lab, which operates the Inside Airbnb website, is also relevant. Inside Airbnb is an advocacy platform that describes itself as providing data and advocacy about Airbnb's impact on residential communities. The TPC and Council should have regard to this affiliation in assessing the weight to be given to research, analysis or data sourced from or influenced by that platform. Professor Phibbs' methodology in this and other contexts has relied on scraped listing data that does not reliably distinguish between whole dwelling conversions, home sharing arrangements, secondary dwellings and other accommodation forms, a limitation directly relevant to the core factual claims in the Era Advisory report about the volume and nature of STRA's impact on housing supply in Hobart.

Separately, the same article contains a concession by Professor Phibbs and his co-authors that is directly relevant to the housing affordability case advanced in support of this amendment. The article states that without properly considering owner motivations and property characteristics, 'tighter regulation could result in vacant properties rather than more long-term rental supply.' This acknowledgment by the authors of AHURI Final Report 460, which forms part of the evidentiary foundation for this amendment, underscores that the relationship between restricting new STRA permits and increasing long-term rental supply is not straightforward and that the housing affordability benefits assumed in the SGS Cost Benefit Analysis may not materialise.

3.4 The scope of the amendment as clarified makes the amenity evidence gap more acute, not less

Council's correspondence of 2 July 2026 confirms that the proposed amendment will not affect existing lawful whole dwelling short-stay accommodation operators, whose existing use rights will be protected and that the amendment does not apply to the use of part of a person's primary or secondary residence, which will continue to be permitted under the existing exemptions in the State Planning Provisions.

This clarification is noted. However, it sharpens rather than resolves the evidentiary concerns raised in sections 3.1 to 3.3 above. If the amendment is prospective in effect only, applying exclusively to new whole dwelling visitor accommodation applications in residential zones rather than to the existing body of permitted operators, then the amenity harm it is intended to address must logically be the harm anticipated from new whole dwelling STRA permits that do not yet exist. On the evidence base as presented, Council has not identified any amenity harm, past or present, that is attributable to the existing stock of whole dwelling STRA properties. It therefore has not demonstrated what specific harm from new whole dwelling STRA properties justifies a prospective prohibition.

The prospective scope of the amendment also fundamentally undermines the housing affordability case. If existing operators retain their use rights, no properties will return to the long-term rental market as a result of this amendment. The sole effect on housing supply is the prevention of future whole dwelling conversions. This means the entirety of the housing affordability benefit claimed in the Era Advisory report and the SGS Cost Benefit Analysis rests on preventing something that has not yet occurred and may not occur at the assumed rate. The SGS Cost Benefit Analysis's own acknowledgment that amenity impacts are not monetised due to limitations in the available evidence and the rental bond data showing active long-term bonds in the Hobart local government area have increased rather than decreased over the past decade, make it difficult to establish the counterfactual that future whole dwelling STRA growth would cause the harm the amendment is designed to prevent.

4. Council's own prior position undermines the case for a Specific Area Plan

This is not the first occasion on which Council has sought to introduce a prohibition on whole dwelling visitor accommodation in residential zones of this kind. A substantially similar proposal was previously advanced by Council during the preparation of the Hobart Local Provisions Schedule (LPS) in 2023 and 2024 and was the subject of representations to the Tasmanian Planning Commission.

In its formal report to the Commission under section 35F of the LUPA Act, dated 4 March 2024, Council, acting in its capacity as planning authority, took the considered position that the proposed prohibition represented “a significant policy matter,” which was “not an issue unique to the Hobart LGA,” and “should be resolved either through a review of the SPPs or a separate scheme amendment,” rather than through a local departure of this kind. Council's report further stated that the legislative framework for the Tasmanian Planning Scheme “is aimed at minimising local departures from the SPPs in order to preserve as much consistency as possible across the State,” and that the relevant statutory process “is not about the opportunity to undertake significant strategic land use planning reviews.” Council's report also found, in respect of the same underlying proposal, that “any new local provisions must demonstrate that the LPS criteria are achieved” and that this “requires more strategic justification than has currently been presented.”

This is directly relevant to the current draft amendment. Section 32(4) of the LUPA Act permits a Specific Area Plan only where the relevant use or development is of significant social, economic or environmental benefit, or where the area has particular qualities unique to it. Council's own most recent formal position on this exact policy proposal, expressed less than two years before certification of draft amendment PSA-25-3, was that the matter is not unique to Hobart and is properly addressed at a statewide level. Council should explain, in its report on representations, what has changed since March 2024 to support the contrary conclusion now advanced in the Era Advisory report and in particular what new evidence, as distinct from a change in policy position, justifies treating this as a matter unique to the Hobart LGA for the purposes of section 32(4).

It is also noted that the 2023 to 2024 attempt to introduce this measure did not proceed to a substantive Commission determination on its merits and instead became the subject of significant procedural dispute regarding the capacity in which Council was purporting to act and the adequacy of the process by which the proposal was advanced. While STAAA does not suggest that the present draft amendment, advanced through the proper exhibition process under Part 3B of the LUPA Act, is subject to the same procedural defects, this history underscores the importance of Council and the Commission now satisfying themselves, on a complete and current evidence base, that the statutory tests in sections 32(4) and 34(2) of the LUPA Act are met, rather than treating the recurrence of the proposal as itself indicative of merit.

5. Visitor economy demand data contradicts the case for restriction

5.1 Tourism Tasmania: Sustained year-on-year STRA demand growth in the Southern region

The draft amendment is proposed at a time when publicly available state government data demonstrates consistently growing year-on-year demand for short-stay accommodation in the Southern region, including Hobart, with no evidence that commercial accommodation is available or positioned to absorb that demand.

Tourism Tasmania's Monthly Accommodation Report for April 2026, drawing on AirDNA data covering entire place listings on Airbnb and VRBO, records that the Southern region set a record for any April with 42,600 short-stay nights booked in the month, up 4.4% on April 2025. For the year ending April 2026, the Southern region recorded 483,300 short-stay nights booked, up 8.3% on the prior year. At a statewide level, the year ending April 2026 saw 996,900 short-stay nights booked, up 5.7% on the prior year, with the April 2026 monthly figure of 87,900 nights itself a record for any April. This year-on-year growth is not an isolated result. It reflects a sustained upward trajectory in STRA demand in the Southern region that has continued consistently across prior reporting periods, demonstrating that visitor demand for short-stay accommodation in Hobart and the surrounding region is a structural and growing feature of Tasmania's visitor economy, not a temporary or marginal phenomenon.

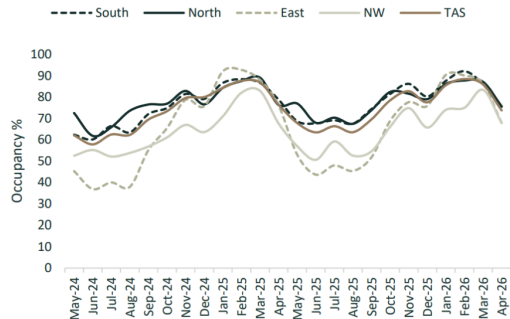
The same Tourism Tasmania report shows that commercial accommodation occupancy across the state was 73.7% in April 2026, down 2.6 percentage points on April 2025. In the Southern region specifically, commercial occupancy was 75.4%, down 3.3 percentage points on the same month in 2025. At the precise time when short-stay accommodation demand in the Southern region is reaching record levels, commercial accommodation occupancy is softening. The available data does not support a conclusion that commercial accommodation supply could or would absorb the visitor demand currently met by short-stay accommodation if the proposed prohibition were to take effect.

Source: [Tourism Tasmania Monthly Accommodation Report, April 2026.](#)

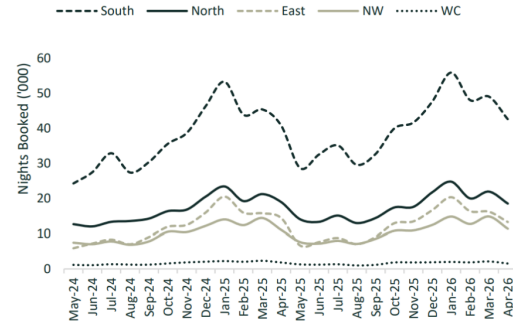
TASMANIAN ACCOMMODATION REPORT

APRIL 2026

COMMERCIAL OCCUPANCY RATE



SHORT-STAY DEMAND (LISTING NIGHTS BOOKED)



COMMERCIAL OCCUPANCY % RATE

Month of: Apr	2020	2021	2022	2023	2024	2025	2026
TASMANIA	20.2	76.6	83.7	68.1	72.1	76.4	73.7
Southern	22.5	80.1	85.0	69.5	72.1	78.7	75.4
Northern	13.1	66.9	83.5	71.5	76.8	76.3	75.6
East Coast	55.0	82.1	75.5	70.8	71.7	76.1	67.8
North West	61.5	80.0	84.2	59.4	66.8	68.0	67.8
West Coast				no data			

Figures are rounded to nearest whole percentage, unless where rounding may obscure small differences. Blank cells = no data

TASMANIAN ACCOMMODATION REPORT

SHORT-STAY DEMAND (LISTING NIGHTS BOOKED)

Month of: Apr	2020	2021	2022	2023	2024	2025	2026
TASMANIA	35.2	67.1	74.9	72.5	75.0	87.7	87.9
Southern	15.5	29.9	33.7	33.1	34.9	40.8	42.6
Northern	8.2	15.4	17.3	15.6	16.3	18.9	18.5
East Coast	5.3	10.7	11.8	12.3	11.3	14.4	13.2
North West	5.1	8.8	9.6	9.1	10.0	11.0	11.3
West Coast	0.70	1.59	1.68	1.68	1.69	1.84	1.55

Figures are in thousands and rounded to nearest 100

King and Flinders Islands are included in the North West and Northern regions, respectively.

TASMANIAN ACCOMMODATION REPORT

APRIL 2026

COMMERCIAL OCCUPANCY RATE

April	Month			Quarter			Year Ending		
	2025	2026	% pt chg	2025	2026	% pt chg	2025	2026	% pt chg
TASMANIA	76.4%	73.7%	▼ -2.6	84%	83%	▼ -0.9	73%	75%	▲ 1.8
Southern	78.7%	75.4%	▼ -3.3	85%	85%	▼ -0.1	75%	78%	▲ 3.0
Northern	76.3%	75.6%	▼ -0.6	84%	83%	▼ -0.8	77%	78%	▲ 1.0
East Coast	76.1%	67.8%	▼ -8.3	86%	81%	▼ -4.2	65%	67%	▲ 1.2
North West	68.0%	67.8%	▼ -0.3	77%	75%	▼ -2.1	64%	65%	▲ 1.3
West Coast	no data			no data			no data		

Percentage point change refers to the absolute difference between two percentages and is calculated from the unrounded figures.

SHORT-STAY DEMAND (LISTING NIGHTS BOOKED – '000s)

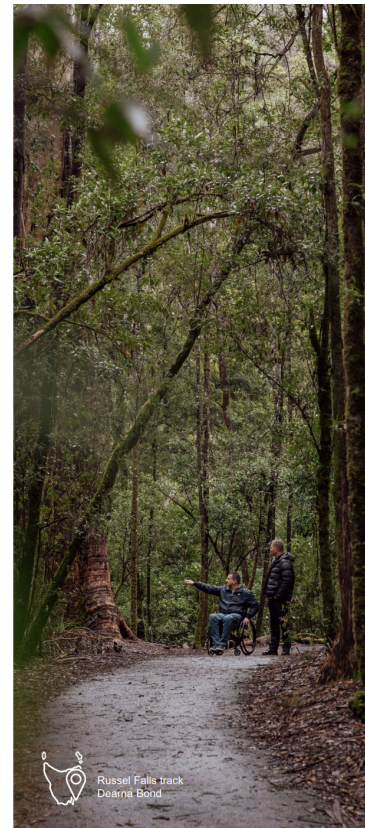
April	Month			Quarter			Year Ending		
	2025	2026	% chg	2025	2026	% chg	2025	2026	% chg
TASMANIA	87.7	87.9	► 0.2%	281.8	292.6	▲ 3.9%	942.9	996.9	▲ 5.7%
Southern	40.8	42.6	▲ 4.4%	130.0	139.7	▲ 7.4%	446.2	483.3	▲ 8.3%
Northern	18.9	18.5	▼ -2.3%	59.4	60.4	▲ 1.8%	202.0	211.6	▲ 4.8%
East Coast	14.4	13.2	▼ -8.0%	46.0	45.8	► -0.6%	144.4	148.4	▲ 2.8%
North West	11.0	11.3	▲ 2.8%	37.8	38.8	▲ 2.8%	121.9	126.3	▲ 3.6%
West Coast	1.84	1.55	▼ -15.7%	6.2	5.6	▼ -10.6%	20.1	19.2	▼ -4.1%

Figures are in thousands and rounded to nearest 100. Percentage change is based on the unrounded figures.

CHANGE KEY

- ▲ More than 1% or 1 percentage point
- ▼ Below -1% or -1 percentage point
- Stable when change is between -1% & +1%, or -1 to +1 percentage point

TASMANIAN ACCOMMODATION REPORT



5.2 Tourism Research Australia: STRA as the dominant accommodation choice for international visitors

Data published by Tourism Research Australia (TRA) demonstrates that STRA is not a marginal accommodation type within Australia's visitor economy, it is the single most significant accommodation category for international visitors and produces materially higher visitor spend and length of stay than any other accommodation type.

Figure 1 below shows that STRA accounts for 40% of all international visitor nights in Australia, the largest single category ahead of hotels and similar accommodation (35%) and visits to friends and relatives or own properties (20%). Of paid international accommodation nights specifically, STRA accounts for 62% - nearly two in every three paid international nights - compared to 31% for hotels and similar accommodation (Figure 2). These figures establish that STRA is the dominant paid accommodation choice of international visitors to Australia by a substantial margin.

STRA accounts for 1 in 12 domestic nights and 2 in 5 of all international nights in Australia

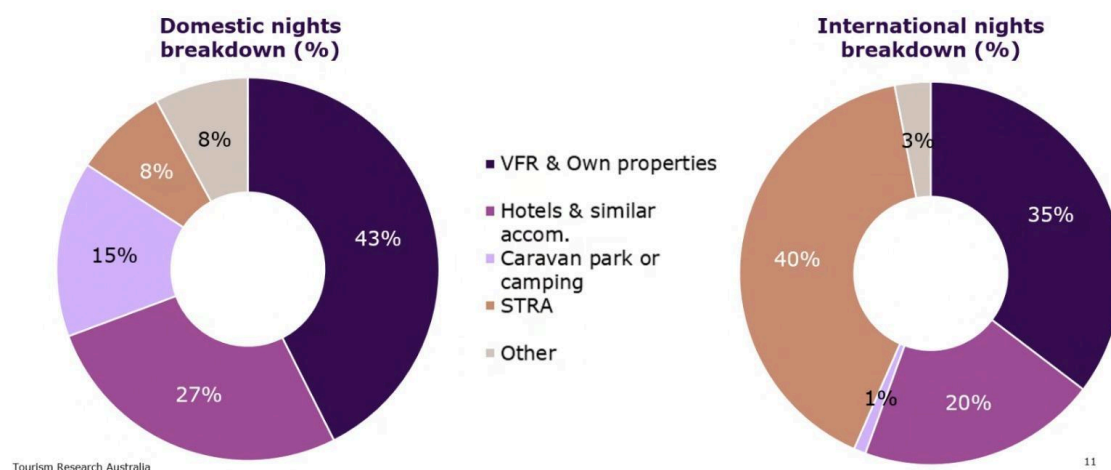


Figure 1: STRA accounts for 2 in 5 of all international nights in Australia (Tourism Research Australia)

Of paid accommodation nights, STRA accounts for 1 in 7 domestic and nearly 2 in 3 international nights

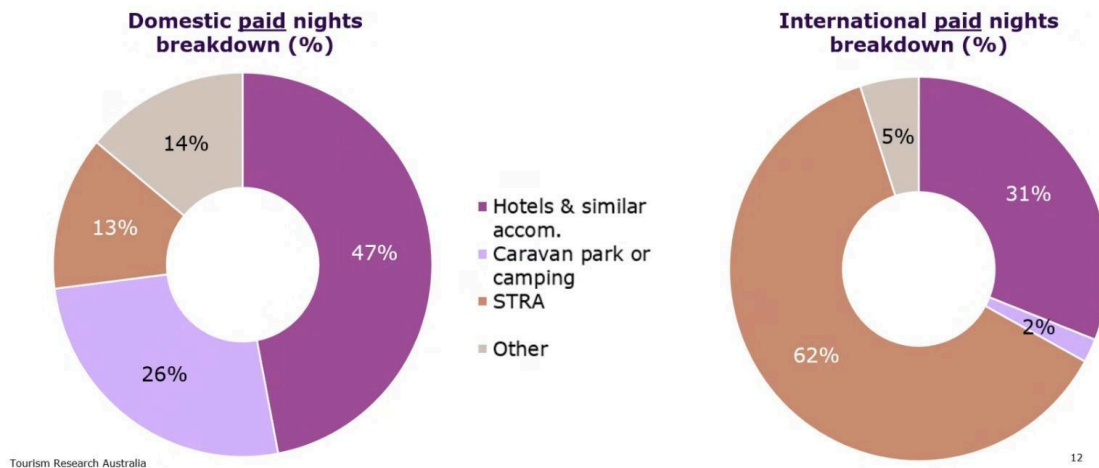


Figure 2: Of paid accommodation nights, STRA accounts for nearly 2 in 3 international nights (Tourism Research Australia)

The economic significance of international visitors choosing STRA over other accommodation types is substantial. As shown in Figure 3, international visitors staying in STRA stay an average of 126 nights and spend an average of \$17,120 in Australia - compared to 38 nights and \$4,830 for the average international visitor across all accommodation types. This represents a 3.3 times longer stay and a 3.5 times higher spend per visitor.

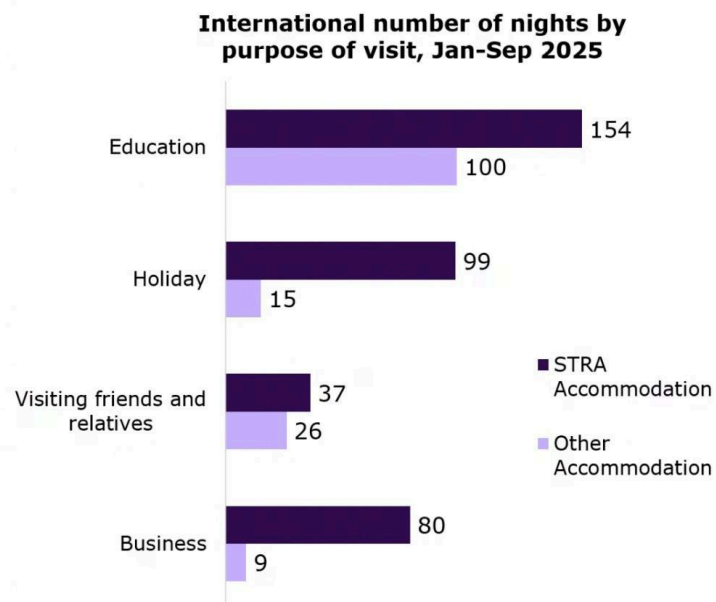


Figure 3: International STRA visitors stay 126 nights and spend \$17,120 on average vs 38 nights and \$4,830 for the average international visitor (Tourism Research Australia, Jan-Sep 2025)

Figure 4 shows that this pattern of longer stays holds regardless of the purpose of visit. International holiday visitors staying in STRA record an average of 99 nights compared to 15 nights for holiday visitors using other accommodation, a 6.6 times difference. International business visitors staying in STRA record 80 nights compared to 9 nights for those in other accommodation.

Those staying in STRA typically stay longer, regardless of the purpose of visit

The accommodation format lends itself to longer-stay visits, and greater opportunities for a larger tourism economic impact for Australia



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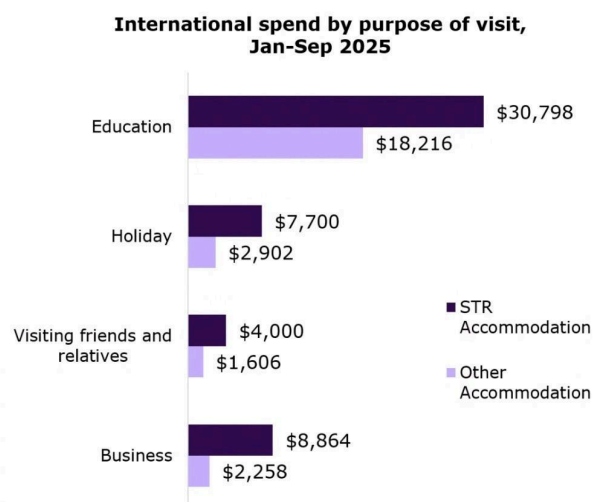
Figure 4: International visitors in STRA stay longer regardless of purpose of visit (Tourism Research Australia, Jan-Sep 2025)

The spend differential is equally pronounced. Figure 5 shows that international holiday visitors in STRA spend an average of \$7,700 compared to \$2,902 for holiday visitors in other accommodation - 2.7 times more. International business visitors in STRA spend \$8,864 compared to \$2,258 for those in other accommodation.

Average spend by visitor type is also significantly more for those who stay in STRA

Education sees the least difference in trip spend (1.7x other accommodation)

Travellers here for Business show the greatest difference based on STRA compared to other accommodation options



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Figure 5: Average international spend is significantly higher for STRA visitors across all purposes of visit (Tourism Research Australia, Jan-Sep 2025)

For domestic visitors, TRA data (Figure 6) shows that those staying in STRA spend \$1,170 on average per trip compared to \$950 for the average domestic visitor - a 23% premium - despite a similar average length of stay. This higher-than-average spend aligns with domestic STRA visitors engaging in a significantly higher number of trip activities, as shown in Figure 7, with STRA visitors more likely than average to eat out at restaurants (68% vs 55%), go sightseeing (48% vs 32%), visit the beach (45% vs 27%), and attend pubs and clubs (32% vs 24%).



Figure 6: Domestic STRA visitors spend \$1,170 per trip vs \$950 for the average domestic traveller (Tourism Research Australia)

Domestic travellers staying in STRA engage in a higher number of trip activities

This aligns with higher-than-average trip spend as they are doing more while on their trip

Potential to pair communication regarding STRA with wider activity engagement and experiences

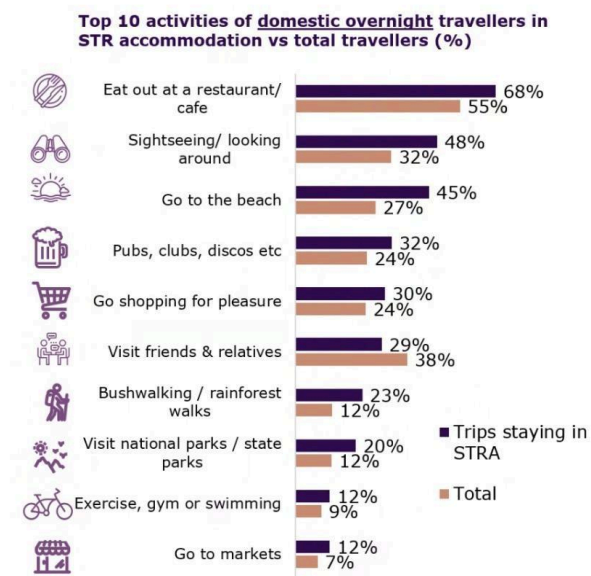
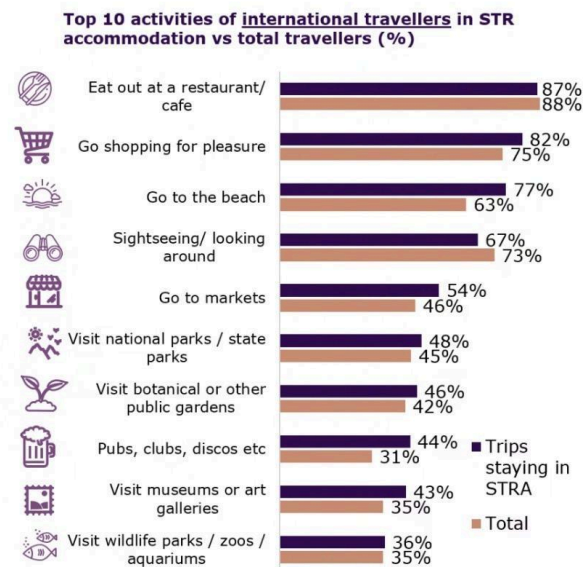


Figure 7: Domestic STRA visitors engage in more trip activities than average (Tourism Research Australia)

International visitors staying in STRA also engage in a higher number of trip activities than the average international visitor, as shown in Figure 8. International STRA visitors are more likely to go shopping (82% vs 75%), visit the beach (77% vs 63%), go to markets (54% vs 46%), visit botanical gardens (46% vs 42%), visit pubs and clubs (44% vs 31%) and visit museums or art galleries (43% vs 35%). This higher activity engagement drives additional economic activity for local businesses throughout the visitor economy.

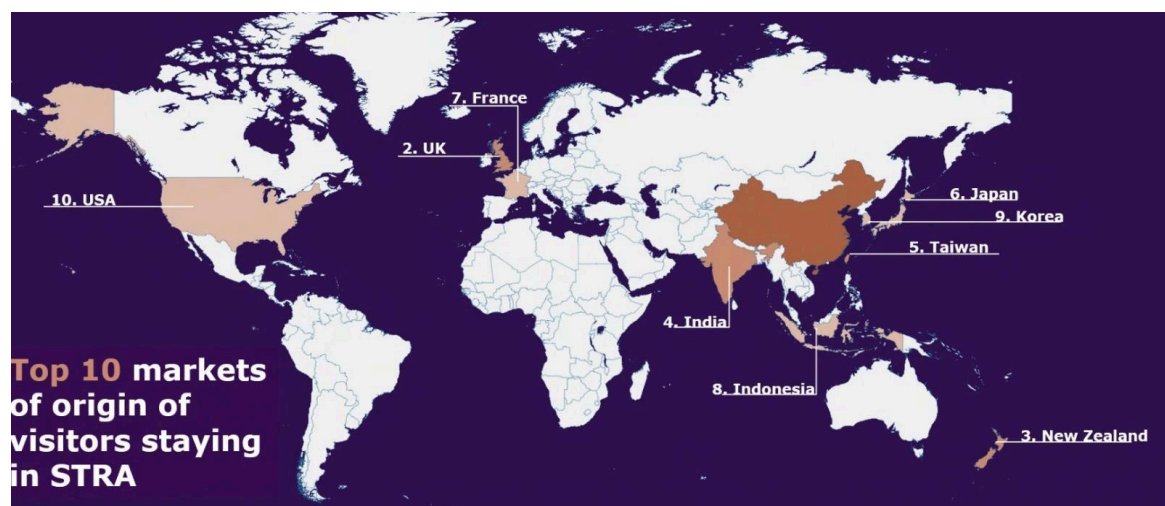
International travellers staying in STRA also engage in a higher number of trip activities

While there is some variation – those not in STRA do more general sight-seeing – the wider impact of travellers staying in STRA vs. the average international traveller is apparent



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Figure 8: International STRA visitors engage in a higher number of trip activities (Tourism Research Australia)



Varies from the top 10 visitor markets to Australia, with a greater skew toward short-term haul destinations

Top 10 overall international markets:

1. New Zealand
2. China
3. UK
4. USA
5. India
6. Singapore
7. Japan
8. Korea
9. Hong Kong
10. Indonesia

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Figure 9: Top 10 markets of origin for STRA visitors compared to overall international markets (Tourism Research Australia)

Figure 9 shows that the top 10 markets of origin for STRA visitors in Australia include the United Kingdom (2nd), New Zealand (3rd), India (4th), Taiwan (5th), Japan (6th), France (7th), Indonesia (8th), Korea (9th) and the USA (10th), with a greater skew toward short-haul destinations from Asia compared to the overall international visitor mix. This is relevant to Tasmania's international visitor strategy and the importance of STRA supply to Hobart as a gateway destination for these growing markets.

All TRA data cited at Figures 1 to 9 is sourced from: [Tourism Research Australia, STRA National Insights \(January to September 2025 data\)](#).

5.3 Macquarie Point: forward demand pressure makes restriction now particularly ill timed

Looking ahead, the case for protecting and growing STRA supply in Hobart is further strengthened by the Macquarie Point multipurpose stadium precinct. The 23,000 seat enclosed stadium, with construction expected to commence in 2026 and the venue projected to open ahead of the 2029 AFL season, has been independently assessed as generating \$178.9 million in annual economic activity for Hobart and supporting 813 full time equivalent jobs once operational. The Tasmania Football Club is set to debut in the AFL in 2028, with interim home games at Bellerive Oval in Hobart and York Park in Launceston already generating forward visitor demand in advance of the stadium opening. Major events at the new precinct will bring regular influxes of interstate and international visitors to Hobart across AFL season weekends and beyond.

Against this backdrop, a prohibition on new whole-dwelling short-stay accommodation in Hobart's residential zones would freeze the city's STRA supply at its current level, with no capacity for growth. As Council has confirmed in correspondence of 2 July 2026, existing permitted operators are unaffected by the amendment. However, as the TRA data at Figures 1 to 9 above demonstrates, international visitors, the cohort most likely to attend marquee events at a new major stadium - account for 62% of all paid accommodation nights in STRA. If Hobart's STRA supply cannot grow with demand, the accommodation capacity needed to service major events at the Macquarie Point precinct simply will not be available in the commercial accommodation market, which, as shown in Figures 1 and 2, accounts for only 31% of paid international visitor nights. Restricting accommodation supply at the point when Hobart's visitor economy is on a long-term growth trajectory underpinned by both existing demand trends and significant committed infrastructure investment is inconsistent with Tasmania's broader visitor economy strategy and with the state government's own visitor economy targets.

The Era Advisory report and supporting documents do not address this supply and demand context. The assertion that the draft amendment will not materially impact on visitor accommodation supply is not supported by the demand data produced by Tourism Tasmania's own government reporting, and does not account for the additional visitor demand that the Macquarie Point precinct and the Tasmania Football Club's AFL participation will generate in the years immediately ahead.

6. Relief sought

STAAA requests that Council, in preparing its report on representations and in any subsequent referral of the draft amendment to the Tasmanian Planning Commission:

- Confirm the steps taken to notify STAAA, as a registered stakeholder, of the commencement of the exhibition period, and address the matters raised in section 2 of this representation;
- Identify the specific evidence relied upon to demonstrate an adverse impact on residential amenity, character, streetscape, car parking or waste management arising from whole-dwelling visitor accommodation in the affected residential zones, as distinct from evidence addressing housing availability and affordability;
- Explain what has changed since Council's own section 35F Report of 4 March 2024, which found this proposal was not unique to the Hobart LGA and was better addressed through statewide reform, to now support certification of an SAP on the basis of section 32(4) of the LUPA Act;
- Address the declared conflicts of interest arising from Council having funded Professor Phibbs' STRA research while simultaneously relying on that research to justify this amendment - as disclosed by Professor Phibbs under The Conversation's mandatory author disclosure policy on 3 July 2026 - and confirm how Council has satisfied itself that the research is independent of that funding relationship;
- Have regard to rental bond data indicating an increase, not a decrease, in active long-term rental bonds in the Hobart local government area over the past decade; and
- In light of the above, not proceed with certification of draft amendment PSA-25-3 in its current form, or, in the alternative, commission an amenity specific evidence base, including complaints and compliance data, sufficient to support the amendment's stated purpose of protecting residential amenity.

7. Conclusion

STAAA supports evidence based planning policy and engages constructively with all levels of government on the regulation of the STRA industry.

STAAA does not consider that the draft amendment, as currently supported by the Era Advisory report and accompanying technical documentation, discharges the evidentiary burden that, on STAAA's understanding, the Tasmanian Planning Commission will require in order to assess whether the volume of visitor accommodation in the affected zones is causing a demonstrable adverse impact on residential amenity.

STAAA welcomes the opportunity to participate in any public hearing held in respect of this draft amendment and to provide further information to Council or the Commission as required.