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Subject: Airbnb - Submission to Hobart City Council Draft LPS Amendment (PSA-25-3)
Date: Thursday, 16 July 2026 5:16:05 PM
Attachments: [Airbnb - Submission to Hobart City Council Draft Local Provisions Schedule Amendment \(PSA-25-3\) .pdf](#)

Good afternoon,

Please find attached Airbnb's submission in response to Hobart City Council Draft Local Provisions Schedule Amendment (PSA-25-3).

Feel free to reach out if you have any questions or would like to discuss this further.

Kind regards,



Jade Hoskins
Public Policy Associate
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Airbnb Submission to Hobart City Council Draft Local Provisions Schedule Amendment (PSA-25-3)

Airbnb welcomes the opportunity to comment on the draft amendment (PSA-25-3) to the Hobart Local Provisions Schedule (LPS). Airbnb is committed to working with the City of Hobart, the Tasmanian Government and the wider community to ensure policy settings that deliver positive outcomes for local jobs, the visitor economy, housing supply and the community.

Airbnb's community of hosts and guests are vital contributors to Hobart's economy, supporting tourism operators and ancillary businesses across the city. The vast majority of our Hobartian hosts are ordinary Tasmanians sharing their homes to help offset the cost-of-living crisis, and we take seriously our responsibility to advocate for regulatory frameworks that are fair, proportionate and evidence-based.

Council's draft LPS amendment to include a visitor accommodation Specific Area Plan (SAP) would prevent many people from sharing a property that helps them earn some extra income during tough economic times or that they rely on to keep up with rising costs.

Airbnb acknowledges that housing affordability and availability are genuine and serious challenges for Hobart, and shares this concern with Council. This amendment, however, is the wrong instrument. It would restrict a vital segment of accommodation while leaving the driver of Hobart's housing problem - insufficient dwelling supply - untouched.

We welcome the opportunity to work constructively with Council on solutions that would more meaningfully support its housing agenda, while minimising the adverse consequences on everyday homeowners who rely on short-stay accommodation to help make ends meet.

Executive summary

Airbnb strongly opposes draft amendment PSA-25-3 and urges Hobart City Council to carefully consider the matters presented below, before progressing such a restrictive measure.

- **Short-stay supports Hobart residents, not just tourists.** Hosting is an economic lifeline. As of March 2026, over 80% of Hobart hosts share just one home for short-stay accommodation.¹ The remaining approximately 20% of listings that appear to be operated by the same owner are often actually homes looked after by a friend, family member, trusted local, or property manager while the owner is travelling, working interstate, or temporarily away. Almost half of Airbnb hosts in Hobart say the

¹ Airbnb internal listing data as at March 2026. Percentage of hosts with only one active listing (listed on Airbnb and has received at least one booking) within the Hobart Local Government Area.



income they earn from Airbnb helps them stay in their own home, which has become crucial amid the current cost-of-living pressures and interest rate rises.² Two thirds of hosts are women and almost a third are over the age of 60.³

- **Short-stay supports vulnerable people.** Short-stays are used for a range of reasons other than tourism: medical stays near major hospitals, transitional housing arranged by community housing providers, insurance placements for families whose homes are uninhabitable, and as Brisbane City Council's recent short-stay review acknowledged, housing for domestic violence survivors. Blunt restrictions hurt these people most. Over a third (37%) of Greater Hobart Airbnb guests say their trip could not have been accommodated by a hotel.⁴
- **Tourism and major events depend on this supply.** Short-stay capacity is crucial in support of major Tasmanian events like Dark Mofo, MONA FOMA, the Taste of Tasmania, Antarctic season arrivals, conferences and festivals throughout the year. The Tasmanian Government's 2030 Visitor Economy Strategy is built on growing visitor numbers, yet accommodation supply research has repeatedly identified significant shortfalls across Hobart and regional Tasmania. Constraining short-stay works directly against the 2030 strategy.
- **Evidence doesn't justify a ban.** Amendment PSA-25-3 is the wrong instrument. The amendment would restrict new whole-dwelling visitor accommodation across Hobart's residential zones, but would not meaningfully address Hobart's housing challenge, which is fundamentally one of insufficient new dwelling supply. Further, research from cities that have introduced blanket restrictions - including [New York](#) and [Barcelona](#) - shows they do not improve housing affordability. They reduce visitor accommodation supply, disadvantage hosts who rely on short-stay income, and fail to deliver meaningful rental relief.
- **The proposed ban won't unlock supply.** Most hosts are sharing their primary residence or a holiday home they use themselves - not operating investment properties that could simply be switched to long-term rental. For most hosts, the property would not enter the long-term rental market if they stopped hosting because in most circumstances the property is still being used by the owner. YouGov research shows that around 60% of short-stay properties never would have been

² Internal Airbnb data - self reported through a survey of 127 Airbnb hosts from January 2025 to December 2025.

³ Self reported on Airbnb platform as of December 31, 2025.

⁴ Self-reported through a survey of 190 Airbnb guests from April 2025 to March 2026.



available for long term rental.⁵

- **The statutory tests under the *Land Use Planning and Approvals Act 1993 (Tas)* (the Act) are not met.** A SAP that seeks to ban STRA does not meet the requirements of a permissible SAP under the Act. Further, the proposed amendment is inconsistent with the Act's objectives and creates an arbitrary divergence between Hobart and its adjacent Councils. The amendment is also inconsistent with higher-order regional strategies and planning policies that enshrine the importance of the visitor economy to Hobart and Tasmania.
- **The statewide framework is sufficient.** Tasmania already has a comprehensive regulatory framework, including planning permit requirements, mandatory platform disclosure and data sharing, and an incoming 5% levy. The State Government has stated publicly the statewide framework "has played a key role in supporting the growth of Tasmania's visitor economy".⁶ That framework should form the basis of regulation, not ad-hoc municipal restrictions layered on top of it. In Hobart, hosts already pay double rates and will face a \$5,000 fee for new discretionary short-stay permit applications. This amendment compounds those existing burdens and will fall hardest on ordinary hosts who rely on hosting to make ends meet.

Airbnb and tourism in Hobart

Airbnb has a longstanding presence in Hobart, underpinned by our diverse host community, who provide unique stays across the Hobart City Council area. Importantly, hosting is a vital economic lifeline for these Tasmanians who want to use a property they own to keep up with the rising cost of living. Over 80% of hosts in Hobart share just one home, and almost half say that the income they own from hosting helps them stay in their home.⁷

Economic Impact

Research from Oxford Economics found that in 2024, spending associated with Airbnb contributed \$500 million to Tasmania's Gross State Product, which in turn supported over 3000 jobs in brick-and-mortar businesses.⁸ With the overwhelming majority (78%) of all

⁵ YouGov, [Host Polling](#), June 2025.

⁶ Department of Treasury, [Tasmanian Short Stay Levy Discussion Paper](#), December 2025, accessed July 2026.

⁷ Airbnb internal listing data as at March 2026. Percentage of hosts with only one active listing (listed on Airbnb and has received at least one booking) within the Hobart Local Government Area.

⁸ Oxford Economics, [The Economic Impact of Airbnb in Australia](#), May 2025.



travellers to Tasmania visiting Hobart, the city enjoys a large share of this economic activity from Airbnb hosts and guests.⁹

Importantly, our community of hosts help to grow events tourism through the creation of unique accommodation supply. The surge capacity, or elastic supply, of our platform presents opportunities for attracting and hosting major events, such as live music and cultural festivals, sporting events, business conferences, or international exhibitions. Tourism in Tasmania directly and indirectly contributes around \$4.55 billion or 10.8 per cent to Tasmania's Gross State Product (GSP).¹⁰

Events and Major Visitor Demand

This flexible capacity is crucial for events like Hobart's Dark Mofo, MONA FOMA, Taste of Tasmania and future events at the soon to be developed Macquarie Point Stadium. All of these drive foot traffic, hospitality spend and economic activity across the city, particularly during off-peak periods when tourism and visitation is crucial to the economic prosperity of the city. When the capacity in hotels and motels is exhausted, short-stay hosts fill the gap and make it possible for Hobart to punch above its weight as an events destination.

The scale of this demand is significant. The Tasmanian Government projects that the stadium could attract 587,000 attendees a year on average, including over 123,000 interstate and overseas visitors with over 104,000 of them from events new to Tasmania.¹¹ Further, Tasmania is projected to welcome 2 million visitors by 2030, a significant increase on the 1.3 million visitors the state welcomed in 2023. These visitors will need accommodation that hotels alone cannot supply.

A 2024 Accommodation Supply Analysis of Hobart and Greater Hobart indicates that when the state reaches its visitor nights demand forecast in 2030, Greater Hobart will require an additional 1,229 rooms, which includes 1,201 rooms in Hobart City.¹² Without any short-stay accommodation to help absorb this demand during peak periods, Hobart will struggle to meet its full potential and lose visitors to other Australian cities that can better accommodate these visitors.

⁹ Office of the Coordinator-General, [Tourism in Tasmania - Discover Investment in Tasmania](#), October 2024, accessed, July 2026.

¹⁰ Tourism Tasmania, ["Who are we"](#), accessed July 2026.

¹¹ Office of the Coordinator-General, [Tourism in Tasmania - Discover Investment in Tasmania](#), October 2024, accessed, July 2026.

¹² Office of the Coordinator-General, [Tourism in Tasmania - Discover Investment in Tasmania](#), October 2024, accessed, July 2026.



For Airbnb hosts to support the tourism growth targets of Hobart City Council, and the State Government, local regulations must be fair and streamlined such that they do not place unreasonable restrictions on hosting. A ban on all future change of use applications for whole-home dwellings across multiple zones will cap Hobart's potential while adversely impacting tourism across the entire state, and the livelihoods of workers, small businesses and hosts who depend on the visitor economy.

Beyond Tourism: Essential Community Infrastructure

Short-stay accommodation also supports important social services and needs that the Council's proposed amendment risks restricting. The additional space and privacy it provides to guests is well-suited to a range of circumstances not easily accommodated in hotels or motels: patients and families travelling for specialist medical care, evacuees displaced by emergencies or disasters, survivors fleeing domestic and family violence, residents relocated during insurance repairs, workers on project placements, community housing providers sourcing transitional accommodation, and families needing flexible stays around life milestones.

Preliminary findings from a forthcoming Griffith University report highlight that guests in these situations frequently describe short-stay accommodation as their only viable option.¹³ Brisbane City Council affirmed this notion when considering its own short-stay permit scheme, which was ultimately abandoned. The feedback it received expressly recognised that short-stay accommodation serve needs well beyond tourism, and the Mayor said:

*"... short-term rentals serve broader needs beyond tourism, such as housing domestic violence survivors, insurance claimants and hospital patients."*¹⁴

The evidence doesn't justify a ban

Housing Supply Issues

According to quarterly data published by the Tasmanian State Government's Consumer, Building and Occupational Services (CBOS), there are approximately 726 secondary

¹³ Griffith University (forthcoming, 2026), *Beyond Tourism: Exploring Non-Leisure Uses of Short-Term Rental Accommodation* (interim report).

¹⁴ Brisbane City Council, [Proposed short-stay Accommodation Local Law 2025](#), May 2025, accessed July 2026.



residences (non-primary whole homes) used for short-stay accommodation in the Hobart Local Government Area.¹⁵

What this data does not capture is that these homes are used by their owners throughout the year for a range of reasons and are not exclusively utilised for short-stay accommodation. For example, they are often family holiday homes; a home used by regional residents when visiting from out of town to access healthcare, education, undertake administrative processes or to visit family and friends. In some cases, secondary residence owners have obtained a permit from the Council to have the flexibility of sharing the property if needed, but they do not actively utilise it.

Therefore, the conflation of secondary residences used for short-stay in Hobart, with homes that could be long-term rentals, are predicated on assumptions and not based in fact. The usage of these permits by owners has not been analysed or tested since PSA-25-3 was first proposed. It is also worth noting that based on the most recently available 2021 census data, secondary residences with a short-stay permit represent less than 3% of total housing stock.¹⁶ This is a relatively modest portion of the housing stock, and cannot be attributed as the main cause of housing issues in Hobart.

Population growth in Hobart is consistently outpacing new development and dwelling supply. From 2016 to 2021 just over 1000 new dwellings were built, despite a population increase of almost 4,000.¹⁷ This structural shortfall is confirmed by industry data: the Housing Industry Australia's 2026 Housing Scorecard ranked Tasmania last of all jurisdictions, with multi-unit approvals, commencements running 40 - 60% below decade averages - precisely the apartment and medium-density supply on which Hobart's constrained footprint depends.¹⁸

In addition, the [30-Year Greater Hobart Plan](#) identifies a need for "around 30,000 new homes" across Greater Hobart over the next 30 years.¹⁹ A ban on new whole-home short-stay accommodation will not unlock that supply, and will not return homes to long-term tenancy at the scale Hobart needs. This can only be achieved by building more homes. On this basis, Airbnb strongly urges the Council to direct its effort to the measures that would make a real difference - growing social and affordable housing and enabling the new supply that Hobart requires to grow sustainably.

¹⁵ Consumer Building and Occupational Services (CBOS), [Short Stay Accommodation Reporting Summary Statistics](#), March 2026, accessed July 2026.

¹⁶ Calculated using CBOS Quarterly short-stay data and 2021 Census Data.

¹⁷ [City of Hobart - Population and Dwellings](#), Profile ID, accessed July 2026.

¹⁸ Housing Industry Association, [Tasmania at the Bottom of National Housing Scorecard as Supply Crisis Deepens](#), July 2026, accessed July 2026.

¹⁹ Greater Hobart Committee, [30-Year Greater Hobart Plan](#), August 2022, accessed July 2026.



Council's Evidence

Airbnb views that the Council's own analysis does not provide a sound evidentiary basis for an intervention as significant as that proposed under the LPS amendment.

It attributes Hobart's low residential vacancy rate primarily to short-stay accommodation, but does not seriously quantify the contribution of other, larger supply-side constraints including construction rates, population growth, owner-occupier trends and migration patterns. A policy response of this magnitude should be proportionate to the problem it targets, and cannot be assessed without first establishing which factors are actually driving the outcome, and to what degree. While this limitation is acknowledged at paragraph 6.1.2 of the Phibbs Report, no attempt is made to apportion the relative contribution of each factor, which would be essential to a proportionate policy response. The proposed amendment therefore risks imposing a significant regulatory burden on the wrong target, or on a target whose true contribution has never been measured.

Further, the finding in the Phibbs report that around 50% of short-stay properties had a prior long-term rental history should also be treated with caution. That finding rests entirely on data from [propertyvalue.com.au](https://www.propertyvalue.com.au), which, even the author acknowledges, captures only properties advertised through real estate agents and therefore excludes all self-managed rentals. In Airbnb's experience, this figure is likely overstated. Research by YouGov found 59% of Australian hosts say their property has never been offered as long-term rentals. A meaningful portion of properties used for short-stay are utilised by the owners themselves and therefore require a degree of flexibility that long-term rental does not provide. Many are holiday homes or second homes that hosts and their families use themselves between guest stays, and were purposefully-acquired or purpose-built for that dual use rather than converted away from the long-term rental pool.

Suzanne; *My cottage in Hobart was purchased by my family 20 years ago with plans for future retirement for my husband and myself. Unfortunately my husband passed away some years ago. As a senior I need to live in Sydney near my family but Hobart is our second home and we all visit regularly to enjoy all that Hobart has to offer. Our cottage will never be offered as a long term rental as it is our home away from home. By hosting with Airbnb my family can visit regularly, the income helps to cover the hefty taxes and rates and we get to share our gem with others. I do not see that I am depriving anyone of a home, rather allowing others to come to beautiful Tasmania, while enjoying the local cafes and restaurants as part of a special holiday experience.*

The conclusion of the Phibbs report also appears at odds with previous articles published by Professor Phibbs, which provide a more nuanced consideration of the effectiveness of STRA regulation. Most recently, Professor Phibbs co-authored [an article in The Conversation](#) in



which it was acknowledged that changes to the rental market following STRA regulation were “difficult to analyse” because STRA listings were only one factor affecting the market. The article continues stating that it is clear that day caps, levies and outright bans “are not the silver bullet to encourage property owners” to switch their property from STRA to long-term rental.

Taken together, the failure to determine how much each cause actually contributes to the vacancy rate and the overstatement risk in the Phibbs conversion estimate, means the Council has not established a causal link between short-stay accommodation and housing scarcity that would be necessary to justify an intervention of this scale. The analysis also fails to take into account recent macroeconomic changes that are currently impacting the housing market across Australia, including [Hobart](#), which will likely continue to change the complexion of the current environment.

Evidence from Other Jurisdictions

Evidence from cities that have introduced blanket bans and restrictions suggests they do not improve housing affordability. They reduce accommodation supply for visitors, adversely impact hosts who rely on sharing income to make ends meet, and fail to deliver meaningful rental relief.

In New York City, a near-total ban reduced active listings by 92%, but has not delivered housing availability or affordability relief. Data shows that, two years on, city-wide rents had risen more than 8%, long-term rental vacancy rates had fallen, and hotel prices were 12.6% higher. Airbnb-commissioned analysis also found strict short-stay rules across four major US cities, including New York, potentially cost up to \$2.4 billion in annual economic activity.²⁰ The same is true in [Barcelona](#). A decade of restrictions, including a ban on new short-stay licences, has coincided with rents increasing 70% and house prices increasing 60%. Closer to home, in [Byron Bay](#), a 60-day cap on short-stay accommodation has not meaningfully improved housing issues, with the average weekly rent rising 7% year on year. In [Lisbon](#) restrictions coincided with [house-price growth](#) nearly doubling and annual rental growth accelerating from 5.7% to 9.2%, with [hotel prices](#) up 30% between 2022 and 2024. The city began rolling restrictions back in 2025.

Airbnb questions the validity of the proposed amendment in the absence of any credible evidence that it would meaningfully ease housing pressure in Hobart. What can be said with confidence is not that the amendment will improve housing supply, but that it will remove, entirely and for good, the option for ordinary Tasmanians to use their own property as they

²⁰ Charles River Associates, [Special Interests v. Public Interests: The Cost of STR Restrictions on Households, Cities, and Visitors](#), 20 December 2024



see fit. For many residents, short-stay letting is not a lifestyle choice but a financial lifeline: a way to supplement a mortgage, support a family member, or stay afloat in a high-cost housing market. Stripping away that option does nothing to solve Hobart's housing challenges; it simply removes a source of income from people who can least afford to lose it, while leaving the underlying drivers of housing scarcity untouched.

The amendment would also entrench an arbitrary division within the community: those who already hold a permit could continue to host, while those who do not, through no fault of their own, would be permanently barred from ever obtaining one. This is not a distinction grounded in planning merit - it is a distinction grounded purely in timing. Two otherwise identical property owners, with identical homes and identical needs, would be treated entirely differently depending only on which side of an arbitrary cut-off date they happened to fall. A policy that creates this kind of permanent, two-tiered outcome without evidence that it delivers any corresponding public benefit cannot be justified on ordinary principles of fair and proportionate regulation.

The statewide framework is sufficient

Tasmania already has a comprehensive statewide short-stay framework, administered under the *Short-Stay Accommodation Act 2019*, that operates alongside the Tasmanian Planning Scheme. It includes planning permit requirements, mandatory platform disclosure and data reporting, as well as a proposed 5% levy on all short-stay bookings - currently before Parliament. Short-stay accommodation is recognised as a matter that should be regulated at the State level for consistency and State government oversight.

The State Government has gone on record saying that the “statewide short-stay accommodation policy has played a key role in supporting the growth of Tasmania’s visitor economy” and that the Government is “committed to protecting the rights of Tasmanians to use their properties to generate income - whether through short-stay or long-term rental - and does not support restrictive measures such as arbitrary caps on short-stay listings.”²¹ The State Government has clearly signalled this as its preferred path - expressly speaking against restrictive prohibitions on what is a lawful use of one's property. The council's proposed amendment to significantly restrict short-stay cuts against that position, is a clear erosion of the statewide consistency already established under the Short-Stay Accommodation Act and will hurt the economic prosperity of the state for years to come.

The cumulative regulatory burden on hosts is already significant. Short-stay hosts in Hobart already comply with the statewide framework, are subject to a differential rating that is

²¹ Department of Treasury, [Tasmanian Short Stay Levy Discussion Paper](#), December 2025, accessed July 2026.



double the general residential rate, and from 1 July 2026, a new discretionary application for a short-stay permit will attract a \$5,000 fee. This is an increase of more than 1000 per cent and was passed by the Council with no community consultation - a consistent pattern with the Council. Short-stay accommodation is a valid and legal use of a residential dwelling. Layering a planning prohibition on top of existing State regulation, the proposed levy, double rates and the unreasonable application fees would compound the burden on ordinary Tasmanian hosts beyond anything justified by the evidence, and without a clear housing benefit.

Airbnb views that the statewide framework should continue to form the basis for short-stay regulation and is open to working collaboratively with the state to continue improving that framework.

Legality of the draft amendment

Airbnb also considers that the proposed SAP is not the appropriate planning tool and does not meet the mandatory LPS criteria set out in s 34 of the *Land Use Planning and Approvals Act 1993* (Tas) (**the Act**).

A SAP limiting STRA is not permissible under an LPS

Under section 32(4) of the Act an LPS may only include a specific area plan if one of two alternative conditions is satisfied:

- a use or development to which the provision relates is of significant social, economic or environmental benefit to the State, a region or a municipal area (paragraph (a)); or
- the area of land has particular environmental, economic, social or spatial qualities that require provisions, that are unique to the area of land, to apply to the land in substitution for, or in addition to, or modification of, the provisions of the State Planning Provisions (paragraph (b)).

The proposed amendment fails to satisfy either of these requirements.

Short-stay accommodation is of significant economic benefit to Tasmania, to the region and to the City of Hobart. As above, the restriction of STRA in the proposed way would have a negative impact on the visitor economy on which the city relies without having a demonstrable positive effect on the long term rental market. Although the ERA Advisory Report (**ERA Report**) argues that the restriction of short-stay is itself a social and economic benefit, Airbnb disputes this application on the basis that the intention of s 32(4)(a) promotes uses or developments that will be of benefit to the relevant area. Hobart City Council should not be allowed to appropriate this tool as a way to restrict a lawful use of property with proven economic benefits to the community. In any event, Airbnb's position is that such



restriction of STRA would not be of *significant* economic or social benefit where, as above, the link between STRA and vacancy rates has never been proven.

Further, the zones in which Council seeks to restrict short-stay accommodation do not exhibit the “*particular* environmental, economic, social or spatial qualities, that require provisions, that are *unique* to the area of land, to apply to the land” (emphasis added). There is nothing particular or unique about the General Residential, Inner Residential and Low Density Residential zones that would warrant an area-specific control of this kind. Short-stay accommodation remains available across all other zone types, including business, commercial and mixed-use zones, and in other zones which are close proximity to the capital city centre.

The proposed amendment is inconsistent with the Act’s objectives

Section 34(2)(c) of the Act requires that the proposed amendment further the objectives set out in Schedule 1 of the Act. These objectives include ‘promoting the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation’.

By significantly reducing the type and quantity of accommodation available to visitors to Hobart, the proposed amendment does not further those objectives - particularly for the many visitors whose needs (including medical and accessibility needs, large family and pets, insurance-related and other extended stays) cannot be met through other forms of visitor accommodation. While the Council argues that an appropriate balance must be struck, Airbnb believes a prohibition on future whole-dwelling visitor accommodation in residential zones is not the correct balance, for the reasons contained in this submission.

The proposed amendment is inconsistent with LPSs applying to adjacent municipal areas

Under section 34(2)(g), the amendment must, as far as practicable, be consistent and co-ordinated with the LPS applying to municipal areas adjacent to Hobart within Greater Hobart.

Airbnb views that the amendment does not meet this requirement on three related grounds. First, the LPSs of adjacent municipal areas, being Clarence, Glenorchy and Kingsborough, do not contain a comparable restriction meaning that the amendment will produce a fragmented and incoherent planning outcome across Greater Hobart. Second, there is nothing particular or unique about Hobart’s General Residential, Inner Residential and Low Density Residential zones that is not equally present in the adjacent councils meaning that the restriction would introduce an arbitrary inconsistency. Third, by restricting visitor accommodation supply within Hobart’s boundaries, the amendment is likely to impact



neighbouring councils, which is at odds with the amendment's stated objective of maintaining coordination between adjacent municipal areas.

The proposed amendment is inconsistent with Regional Strategies, Plans and Policies

The proposed amendment also fails to align with several higher-order strategies and policies that the Act requires Council to take into account, suppressing a demonstrably beneficial economic use across Hobart's residential heart without a settled evidentiary basis to justify that outcome.

- Section 34(2)(e) of the Act requires the amendment, as far as practicable, to be consistent with the Southern Tasmanian Regional Land Use Strategy 2010–2035. That regional strategy specifically supports flexibility for holiday homes to be used for occasional short-short accommodation (strategy T1.4). The proposed amendment does the opposite. It restricts whole-home short-stay accommodation regardless of whether a property is a holiday home or used for other purposes by the owner themselves. The ERA Report's response, that housing in Hobart is "generally not holiday homes," ignores the fact that the amendment will capture the majority of holiday homes within its broad restriction. This result cuts against the regional strategy.
- Section 34(2)(f) of the Act requires the amendment to have regard to the Capital City Strategic Plan 2023, which envisages Hobart continuing to play a significant role in the visitor and tourism economy and as a gateway city to Tasmania. A broad restriction on new whole-home short-stay permits in Hobart's residential zones materially reduces the city's capacity and diversity of accommodation used to accommodate visitors, particularly given that alternative accommodation options face the same supply constraints. The amendment, as drafted, works against this plan.
- Section 34(2)(da) of the Act requires the amendment to satisfy the relevant criteria in relation to the Tasmanian Planning Policies (effective 1 July 2026), which aim to facilitate housing and services that support tourism while ensuring visitor accommodation does not significantly impact housing for the local community. The proposed amendment does not strike that balance - a ban on new whole-home listings in residential zones goes further than what these policies contemplate - particularly where there is no evidence that such measures assist with increasing housing supply.

Conclusion



Airbnb is committed to working constructively with the City of Hobart and the Tasmanian Government to support outcomes that work for all Hobart residents.

Airbnb respectfully requests that the City of Hobart decline to proceed with draft amendment PSA-25-3. In summary:

- The amendment would restrict the ability of everyday Tasmanians to share their homes at a time of significant increase in cost-of-living pressures;
- It relies on evidence that has not established a causal link between short-stay accommodation and housing scarcity, and fails to quantify the relative contribution of other supply-side factors;
- It sits at odds with the State's short-stay accommodation framework, as well as the broader objectives and assessment criteria of the planning system; and
- It would harm hosts, visitors and the visitor economy noting short-stay contributes \$500 million to GSP, without offering a meaningful solution to the supply-side housing pressures it seeks to address.

The evidence is clear: restrictive measures do not solve housing pressures and instead result in a range of unintended consequences such as cutting off an important economic lifeline for local hosts and communities.

Further restrictions would not deliver meaningful new housing supply, but would create real costs for hosts, visitors and vulnerable people who rely on flexible accommodation. Airbnb reiterates its offer, made at the outset of this submission, to work with Council on measures that would directly address Hobart's housing supply challenge, including continued collaboration on the State's established framework. We would welcome the opportunity to meet with Council officers to discuss this matter ahead of any further progression of PSA-25-3.