



City of **HOBART**

28/09/2026

Dear Mr Robins,

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

We refer to the above matter and confirm the City of Hobart's report pursuant to section 40K of the *Land Use Planning and Approvals Act 1993* (Tas) (**40K Report**) has been endorsed, adopted and finalised.

A copy of the City's section 40K report is provided.

The 40K Report collates all relevant attachments into one document, including the representations received. The attachments are listed in the index, and bookmarks have been enabled to assist with navigation of the document due to its size.

To avoid duplication of documents, we ask that you please disregard the representations previously provided to the Commission as all representations have been collated into the **enclosed** 40K Report.

If you have any difficulties in opening the file, please let me know.

The City's 40K Report has been finalised under delegation by the City's Chief Executive Officer pursuant to a delegation of power pursuant to section 6(3) of the *Land Use Planning and Approvals Act 1993* (Tas) dated 10 June 2026 for item 8.1, as follows:

"That:

...

4. Pursuant to section 6(3) of the [Land Use Planning and Approvals Act 1993] Act, the Planning Authority delegates all of its functions and powers pursuant to Part 3B of the Act to the Planning Authority's Chief Executive Officer with respect to Amendment PSA-25-3; and

5. The Planning Authority authorises the Lord Mayor to sign an instrument of delegation to record the Planning Authority's delegation."

The Planning Authority's delegation to its Chief Executive Officer remains current.

Should you require any further information, please do not hesitate to contact us.

Kind Regards,



Jennifer Lawley

Manager Strategic Land Use Planning



City of **HOBART**

DECISION:

That:

- A. in accordance with the resolution of the Planning Authority dated 10 June 2026 made in respect of item 8.1 to delegate power to me pursuant to section 6(3) of the *Land Use Planning and Approvals Act 1993* (Tas) (**LUPAA**);
- B. acting as delegate of the Planning Authority; and
- C. confirming that in making this decision, I have read and considered:
 - a. each of the representations received by the Planning Authority pursuant to section 40J of LUPAA in relation to the draft amendment:
 - i. before the end of the exhibition period in relation to the draft amendment, as required by section 40K(2)(a) of LUPAA; and
 - ii. after the end of the exhibition period in relation to the draft amendment, as required by section 40K(2)(b) of LUPAA; and
 - b. the report prepared by Emma Riley at Era Advisory dated 17 September 2026 (**Era Advisory Representation Report**); and
 - c. the Officer's Report dated 17 September 2026 (**Officer's Report**);

I determine as delegate of the Planning Authority, as follows:

- (1) to accept, in the Planning Authority's discretion, the representations received after the end of the exhibition period pursuant to section 40K(2)(b) of LUPAA.
- (2) to clarify that the Planning Authority **endorses and adopts** each of the statements expressed within Era Advisory Representation Report as being the Planning Authority's opinion as to the merit of each representation received for the purposes of section 40K(2)(c), including:
 - a) statement of whether the Planning Authority is of the opinion that the draft amendment ought to be modified to take into account the representation, which it is not (section 40K(2)(c)(i)); and
 - b) statement of effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation, which there are none (section 40K(2)(c)(ii)).
- (3) to receive the Officer's Report attached to this memorandum which addresses the statutory requirements of sections 40K(2)(d) and (e) of LUPAA.
- (4) having considered each of the elements of section 40K of LUPAA and having regard to the contents and expression of opinion within the Officer's Report, I determine the Planning Authority is satisfied:
 - a) that the draft amendment PSA-25-3 HOB S11.0 Hobart Visitor Accommodation Specific Area Plan meets the LPS criteria; and
 - b) the recommendations contained within the Officer's Report in response to sections 40K(2)(e) are recommendations on behalf of the Planning Authority in relation to the draft amendment which the Planning Authority thinks fit; and
 - c) endorses and adopts the opinions and recommendations as being those of the Planning Authority.
- (5) for the purposes of section 40K of LUPAA, the documents which together comprise the Planning Authority's report required to be prepared by the Planning Authority and provided to the Commission pursuant to section 40K of LUPAA (**40K Report**) are the following:



City of **HOBART**

- a) each representation received pursuant to section 40J of LUPAA in relation to draft amendment PSA-25-3;
 - i) before the end of the exhibition period in relation to the draft amendment, as required by section 40K(2)(a) of LUPAA; and
 - ii) after the end of the exhibition period in relation to the draft amendment, as required by section 40K(2)(b) of LUPAA;
 - b) the Era Advisory Representation Report;
 - c) the Officer's Report; and
 - d) this record of decision.
- (6) directs that a copy of the 40K Report, along with a copy of this decision, is provided to the Commission in satisfaction of section 40K of LUPAA.

Dated:

18/09/2026

OFFICER'S REPORT TO CHIEF EXECUTIVE OFFICER		
ITEM TITLE:		PSA-25-3 VISITOR ACCOMMODATION SAP
ITEM PROVIDED BY:		Strategic and Regulatory Services
Dated		17 September 2026
Author		Joanne Hickman (Strategic Planner) Jennifer Lawley (Manager Strategic Land Use Planning)
Approver		Karen Abey (Director Strategic and Regulatory Services)
ATTACHMENTS:		1. Representations received pursuant to section 40J in relation to the draft amendment PSA-25-3 HOB S11.0 Visitor Accommodation Specific Area Plan 2. Era Advisory Representation Report, 17 September 2026 3. Draft Hobart Visitor Accommodation SAP, dated 14 August 2026; 4. Instrument of Certification of the Draft Amendment, dated 15 June 2026 5. Era Advisory report on Visitor Accommodation amendment dated 1 April 2026 6. Professor Peter Phibbs' report, dated 18 February 2026 7. SGS Economics and Planning Cost Benefit Analysis report, dated 19 March 2026

1. EXECUTIVE SUMMARY

- 1.1. The Planning Authority's certified draft amendment to insert a new Specific Area Plan (**SAP**), *HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan (Draft Amendment)*, into the Hobart Local Provision Schedule (**LPS**) has been publicly exhibited, with the exhibition period having ended.
- 1.2. Following the exhibition period ending, the Planning Authority is required to prepare a report to the Tasmanian Planning Commission (**Commission**) pursuant to section 40K of the *Land Use Planning and Approvals Act 1993* (Tas) (**LUPAA**).
- 1.3. For the purposes of the Planning Authority considering and assessing the representations received in response to the Draft Amendment, the following documents are provided as attachments together with this Officer's report, for the purposes of section 40K of LUPAA:
 - (a) the representations received:
 - (i) before the end of the exhibition period (s 40K(2)(a)); and

- (ii) after the end of the exhibition period (s 40K(2)(b));
 - (b) Era Advisory's report dated 17 September 2026 (**Era Advisory Representation Report**) which considers all representations received and which assesses:
 - (i) the merit of each representation;
 - (ii) whether the Draft Amendment ought to be modified to take into account the representations; and
 - (iii) the effect of the Draft Amendment, and the LPS to which it related, as a whole, of implementing the recommendations;
 - (c) Draft Hobart Visitor Accommodation SAP, dated 14 August 2026;
 - (d) Instrument of Certification of the Draft Amendment, dated 15 June 2026;
 - (e) Era Advisory report on Visitor Accommodation amendment dated 1 April 2026 (**Era Advisory Application Report**);
 - (f) Professor Peter Phibbs' report, dated 18 February 2026 (**Phibbs' Report**); and
 - (g) SGS Economics and Planning Cost Benefit Analysis report, dated 19 March 2026 (**SGS Report**).
- 1.4. The purpose of this report is to consider the Draft Amendment in light of the representations received and to determine:
- (a) whether the Draft Amendment of an LPS meets the LPS criteria in section 34 of LUPAA (**LPS Criteria**), in accordance with section 40K(2)(d) of LUPAA; and
 - (b) whether any recommendations in relation to the Draft Amendment should be made in accordance with section 40K(2)(e) of LUPAA.

2. BACKGROUND

- 2.1. The Draft Amendment proposes to insert HOB-S11.0 Hobart Visitor Accommodation SAP into the LPS.
- 2.2. The Draft Amendment seeks to restrict the circumstances in which there can be a new use for whole dwellings for visitor accommodation within the residential zones.
- 2.3. The Draft Amendment has been prepared following expert opinion evidence from:
 - (a) Phibbs Report;

- (b) SGS Report; and
- (c) Era Advisory Application Report.

(collectively referred to as **Expert Evidence**).

- 2.4. This SAP will be applied by way of overlay and seeks to substitute the existing visitor accommodation use standards in the General Residential, Inner Residential and Low-Density Residential zones that are used in the City of Hobart.
- 2.5. The primary purpose of the Draft Amendment is to limit the impact of new visitor accommodation use on the availability and affordability of housing for long-term residents in the municipal area. This is an amendment which responds to the unique and local conditions present in the municipal area.
- 2.6. The Draft Amendment was informed by:
 - (a) extensive background analysis, including data on housing and rental markets, tourism trends, existing visitor accommodation supply and planning approvals; and
 - (b) reports prepared by Professor Peter Phibbs and SGS Economics and Planning, which were prepared to understand the impacts of short stay accommodation on rental housing supply, affordability and broader urban outcomes.
- 2.7. The supporting economic and planning evidence, including the Phibbs Report and SGS Report demonstrate that the Draft Amendment proposes to deliver a clear net community benefit through improved housing outcomes while still allowing the visitor economy to be accommodated.
- 2.8. The Draft Amendment will be applied by way of overlay and seeks to substitute the existing visitor accommodation use standards in the residential zones that are used in the municipal area which arise from the State Planning Provisions (**SPP**) (see **Attachment 4** for the spatial extent of the SAP overlay).
- 2.9. These use standards are:
 - (a) General Residential Zone – Clause 8.3.2 Visitor Accommodation;
 - (b) Inner Residential Zone – Clause 9.3.2 Visitor Accommodation; and
 - (c) Low Density Residential Zone – Clause 10.3.2 Visitor Accommodation.
- 2.10. The Draft Amendment does not affect:

- (a) the status of visitor accommodation in any other planning zones, such as the Local Business Zone, General Business Zone, Central Business Zone or the Urban Mixed Use Zone; or
 - (b) any other SAP, such as the Battery Point SAP or Hobart Commercial Zone SAP.
- 2.11. The SAP use standard seeks to limit the approval of visitor accommodation to limited circumstances through an acceptable solution with no performance criteria.
- 2.12. A detailed outline of the Draft Amendment is provided in section 3.1 of the Era Advisory Application Report.
- 2.13. The Draft Amendment allows for new visitor accommodation where it arises due to a new development. This is to encourage the redevelopment of underutilised sites.
- 2.14. It is important to note that the Draft Amendment does not affect existing visitor accommodation exemptions at Clause 4.1.6 of the SPPs. There is no mechanism for the Planning Authority to substitute or modify exemptions in the SPPs.
- 2.15. The Draft Amendment does not apply to the use of part of a person's primary residence or a secondary residence for visitor accommodation, which will continue to be allowable under existing exemptions in the SPPs.
- 2.16. The certified Draft Amendment is available at **Attachment 3**.
- 2.17. On 10 June 2026, the Planning Authority Committee (**PAC**) resolved as follows:

"That

- 1. The Planning Authority receive and note this report, Visitor Accommodation SAP PSA, prepared by the Manager Strategic Land Use Planning dated 10 June 2026.*
- 2. Pursuant to section 40D(b) of the Land Use Planning and Approvals Act 1993 ('the Act'), the Planning Authority, of its own motion, prepares a draft amendment of the Hobart Local Provisions Schedule ('LPS'), being "Amendment PSA-25-3" to insert "HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan" at Attachment B into the LPS of the Tasmanian Planning Scheme - Hobart.*
- 3. Pursuant to section 40F(1) of the Act, the Planning Authority considers whether Amendment PSA-25-3 meets the LPS Criteria in section 34 of the Act and:*
 - a. pursuant to section 40F(2)(a), is satisfied that Amendment PSA25-3 meets the LPS Criteria and the requirements of the Act; and*

b. pursuant to section 40F(2)(a) of the Act, certifies that draft amendment, Amendment PSA-25-3, meets the requirements of the Act; and

c. pursuant to section 40F(3) of the Act, authorises affixing of the Planning Authority's common seal to the certificate.

4. Pursuant to section 6(3) of the Act, the Planning Authority delegates all of its functions and powers pursuant to Part 3B of the Act to the Planning Authority's Chief Executive Officer with respect to Amendment PSA-25-3.

5. The Planning Authority authorises the Lord Mayor to sign an instrument of delegation to record the Planning Authority's delegation.

6. In accordance with Section 40G of the Land Use Planning and Approvals Act 1993, the Planning Authority places the amendment on public exhibition for a period of 28 days."

2.18. From 19 June – 16 July 2026, the Draft Amendment was publicly exhibited pursuant to section 40H of LUPAA.

2.19. Public notices advising the community were placed in the Mercury Newspaper on Thursday 18 June 2026 and Saturday 27 June 2026 in accordance with section 40G(2) of LUPAA.

2.20. Notifications were sent to TasWater and other State service agencies and State authorities, advising of the public exhibition of the Draft Amendment in accordance with section 40FA of the LUPAA.

3. REPRESENTATIONS RECEIVED

3.1. 51 representations in total were received in relation to the Draft Amendment. Of those 51, six (6) representations were received after the end of the exhibition period.

3.2. 14 representations were received which supported the Draft Amendment. 36 representations opposed the Draft Amendment, with the remaining representation from TasWater being neutral.

3.3. The number of representations is not a factor for the Planning Authority in considering this section 40K report. It is very common for more representations to be received opposing an amendment than in support.

3.4. Section 40K(2)(b) of LUPAA provides that the Planning Authority has discretion on whether to accept representations received outside the exhibition period.

3.5. It is recommended to the Planning Authority that it determines, in its discretion, to accept the representations received outside the exhibition period.

4. DISCUSSION ON THE MERITS OF THE REPRESENTATIONS – SECTION 40K(2)(C)

- 4.1. As noted above, external consultants Era Advisory have been engaged to review and consider the representations received in relation to the Draft Amendment.
- 4.2. The Era Advisory Representation Report which:
 - (a) summarises the contents of each representation received;
 - (b) addresses each representation;
 - (c) assesses the merits of each representation pursuant to section 40K(2)(c);
 - (d) considers whether the Draft Amendment ought to be modified to take into account the representations, pursuant to section 40K(2)(c)(i); and
 - (e) the effect on the Draft Amendment, and the LPS to which it relates, as a whole of implementing the recommendation, pursuant to section 40K(2)(c)(ii).

Representations in Support

- 4.3. Representations in support of the Draft Amendment generally raised concerns about the impact of whole dwelling visitor accommodation on long-term rental availability, housing affordability, neighbourhood cohesion and the residential function of land within residential zones.
- 4.4. Several supporting representations considered that residential dwellings in residential zones should primarily be retained for permanent residents and that visitor accommodation should be directed to more appropriate commercial or mixed-use locations.

Representations Opposing

- 4.5. Representations opposing the Draft Amendment raised a broader range of issues, including the economic and tourism role of short stay accommodation, the importance of visitor accommodation for families, workers, medical visitors and major events, impacts on small businesses and property owners, concerns about private property rights and investment certainty, and the need for Statewide consistency.
- 4.6. A number of opposing representations raised concerns with the evidence base for the Draft Amendment, including the relationship between whole dwelling visitor accommodation and housing availability, the treatment of existing lawful use rights, reliance on housing and rental data, amenity evidence, and the assumptions underpinning the supporting cost-benefit analysis.

5. STATEMENT ON WHETHER THE PLANNING AUTHORITY IS SATISFIED THE DRAFT AMENDMENT MEETS THE LPS CRITERIA – SECTION 40K(2)(D)

5.1. The Draft Amendment is considered to meet the LPS Criteria and Planning Officers recommend the Draft Amendment be submitted to the Commission.

5.2. The Draft Amendment is considered to satisfy the LPS Criteria in section 34 of LUPAA for the following reasons:

- (a) the Draft Amendment has a sound and reasonable planning basis in accordance with LUPAA;
- (b) the Draft Amendment is supported by substantial evidence contained within the Expert Evidence reports, with the Era Advisory Application report providing a detailed assessment against section 34(2) of LUPAA section 4;
- (c) the Draft Amendment will be implemented through a correctly structured SAP which is authorised by the SPPs;
- (d) the Draft Amendment responds to unique local circumstances within the municipal area of the City of Hobart, where the Expert Evidence demonstrates that the conversion of long-term rental dwellings to whole-dwelling visitor accommodation has materially reduced rental housing supply and affordability in an already constrained market;
- (e) The Draft Amendment is carefully targeted with a limited application only to residential zones where these impacts have been identified, while retaining home-sharing exemptions, allowing visitor accommodation in other planning zones, and continuing to support new developments which provide visitor accommodation without a net loss of dwellings.

5.3. Resource Management and Planning System (**RMPS**)

- (a) The Draft Amendment furthers the objectives of the RMPS by:
 - (i) promoting the fair, orderly and sustainable use of land;
 - (ii) supporting housing availability and affordability;
 - (iii) protecting residential amenity; and
 - (iv) balancing competing demands between tourism and housing.

5.4. State Policies

- (a) The Draft Amendment is consistent with applicable State Policies.
- (b) Section 34(2)(d) of LUPAA requires the Draft Amendment to be consistent with each State policy. There are currently three State policies operational

in Tasmania that articulate the Government's strategic policy direction. Additionally, the *National Environmental Protection Measures* are taken to be State Policies.

5.5. Tasmanian Planning Policies (**TPP**)

- (a) The TPPs were declared by the Minister for Planning on 12 November 2025 and came into effect on 1 July 2026. The TPPs have been considered as part of this assessment.
- (b) The Draft Amendment satisfies the relevant TPPs relating to settlement, housing, tourism and strategic planning.

5.6. Southern Tasmania Regional Land Use Strategy (**STRLUS**)

- (a) Section 34(2)(e) of LUPAA requires the Draft Amendment, as far as practicable, be consistent with the regional land use strategy that applies to the area, being the STRLUS.
- (b) An assessment has been undertaken against the STRLUS declared by the Minister for Housing and Planning on 11 September 2026. It is considered that there are limited implications in relation to regional policies under the STRLUS. This is because the scale of impact arising from the Draft Amendment does not have a substantive impact at the metropolitan or regional scale.
- (c) Overall, the Draft Amendment is as far as practicable consistent with the STRLUS by balancing tourism growth with settlement strategy objectives, infrastructure efficiency, and long-term liveability outcomes.
- (d) The Draft Amendment is as far as practicably consistent with the STRLUS as it protects well-located housing stock, supports compact urban growth and directs future visitor accommodation to more appropriate locations.
- (e) It is acknowledged that the Southern Tasmania Regional Land Use Strategy 2026 was declared by the Minister for Housing and Planning on 11 September 2026.

5.7. The Draft Amendment:

- (a) has regard to the City of Hobart's strategic planning objectives;
- (b) does not conflict with adjoining municipal planning schemes in that the legislation does not require strict consistency; and
- (c) raises no issues in relation to prescribed safety requirements.

5.8. The supporting economic and planning evidence, including the Phibbs Report and the SGS Report, demonstrates that the Draft Amendment delivers a clear net

community benefit through improved housing outcomes while still allowing the visitor economy to be accommodated.

- 5.9. Some representations received raised concerns with the Draft Amendment's compliance with the LPS Criteria. Upon consideration of those concerns, they are considered to represent a difference of opinion and interpretation than that provided by the Planning Authority's experts.
- 5.10. There is nothing identified in the representations which is considered to alter the previous expert advice from Professor Phibbs and SGS Economics and Planning that the Draft Amendment satisfies the LPS Criteria.

6. RECOMMENDATIONS THE PLANNING AUTHORITY THINKS FIT – SECTION 40K(2)(C)(E)

- 6.1. Following receipt of the representations and consideration of their contents, Council's Planning Officers have identified minor modifications to the Draft Amendment for the purpose of clarifying the scope and application of the Draft Amendment.
- 6.2. The proposed modifications will not affect the LPS, and the Planning Officers are satisfied the Draft Amendment will continue to meet the LPS Criteria.
- 6.3. The Draft Amendment including the proposed modifications is included at **Attachment 3**.
- 6.4. The Instrument of Certification includes a copy of the previous version of the Draft Amendment in **Attachment 4**.
- 6.5. The recommended changes are as follows:
 - (a) minor corrections to text within HOB-S11.2.1 to accurately refer to Figure HOB-S11.1, not F11.1.
 - (b) minor corrections to text within HOB-S11.2.4 to accurately refer to Figure HOB-S7.1, not Figure HOB-S7.4 and change the word 'designed' to 'designated'.
 - (c) replacement of Figure HOB-S11.1 Hobart Visitor Accommodation Specific Area Plan to clarify that the area of land designated as Hobart Visitor Accommodation Specific Area Plan will not include Battery Point, should the Draft Amendment be approved.
- 6.6. Whilst the area of land designated as Hobart Visitor Accommodation SAP clearly indicates that Battery Point is not included in the Council reports and overlay mapping, it is considered appropriate to ensure that Figure HOB-S11.1 makes this equally clear.

- 6.7. The proposed modifications are considered minor in nature and do not change the substance of the Draft Amendment, or the documents previously exhibited. The modifications are designed to clarify the Draft Amendment. The proposed modifications would be localised to the Draft SAP and would not have any effect on the LPS as a whole. The Draft Amendment is considered to continue to meet the LPS Criteria with these modifications adopted.

7. LEGAL, RISK AND LEGISLATIVE REQUIREMENTS

7.1. Legal Considerations

- (a) The Draft Amendment represents a balanced planning response that aligns with the objectives of the RMPS. It is evidence-based, locally responsive and coordinated with the statutory planning framework. On this basis, the Draft Amendment is considered to satisfy the relevant legislative criteria in LUPAA, warrants certification and progression through the planning scheme amendment process.
- (b) The Draft Amendment was prepared pursuant to Part 3 of LUPAA and has been assessed against the LPS Criteria.
- (c) The Draft Amendment was exhibited in accordance with section 40H of the LUPAA, representations were received pursuant to section 40J of LUPAA and the merits of the representations have been considered in accordance with section 40K of LUPAA.
- (d) Following a review of the representations, there are no matters within the representations which is considered to alter the previous expert advice received by the Planning Authority that the Draft Amendment satisfies the LPS Criteria.
- (e) In accordance with section 40K(2)(e) of LUPAA, Planning Officers recommend minor modifications to the Draft Amendment. The proposed modifications will not have any effect on the LPS as a whole. The Draft Amendment is considered to continue to meet the LPS Criteria if the minor modifications are adopted.
- (f) The Draft Amendment:
 - (i) is consistent with the form and content requirements of the SPPs;
 - (ii) does not extinguish lawful existing uses;
 - (iii) appropriately applies locally specific controls through a SAP and represents a balanced planning response that is evidence-based and locally responsive;

- (iv) is consistent with State Policies and satisfies the relevant criteria in relation to the Tasmanian Planning Policies; and
- (v) aligns with relevant regional and municipal strategic documents.

7.2. Risk Considerations

- (a) Key risks relate to the stakeholder opposition received during the exhibition process and scrutiny by the Commission.
- (b) These risks can be mitigated by the extensive evidence base and robust statutory assessment supporting the Draft Amendment.

8. STRATEGIC ALIGNMENT

8.1. The subject of this report is provided in alignment with the Capital City Strategic Plan and supports the delivery of the following strategic objectives, namely:

(a) **Pillar 7: Built Environment**

Outcome: 7.1 Hobart has a diverse supply of housing and affordable homes.

8.2. Having regard to the representations received and the Era Advisory Representation Report, the Draft Amendment is considered to have a sound and reasonable planning basis. It is consistent with the objectives of the RMPS, is consistent with relevant State policies, regional strategies and the relevant Tasmanian Planning Policies, and supports the City of Hobart's strategic objectives for housing, liveability and balanced growth.

9. CONCLUSION

9.1. In conclusion, Council's Planning Officers recommend to the Planning Authority that it approve the section 40K report to the Commission which contains:

- (a) a copy of the representations received before and after the exhibition period, as required by sections 40K(2)(c)(i) and (ii);
- (b) the Era Advisory Representation Report, the contents of which is recommended to the Planning Authority to be accepted and endorsed as the position and statement of the Planning Authority's opinion on the merits of the representations received in accordance with section 40K(2)(c), and whether as a result of the representations, the Planning Authority recommends modifications ought to be made to the Draft Amendment;
- (c) a statement that the Planning Authority is satisfied the Draft Amendment of an LPS meets the LPS Criteria, as required by section 40K(2)(d); and



City of **HOBART**

- (d) outlines the minor modifications recommended for the purpose of clarifying the application and scope of the Draft Amendment which the Planning Authority thinks fit, as required by section 40K(2)(e).

Author(s)

Joanne Hickman (Strategic Planner)

**Jennifer Lawley (Manager Strategic
Land Use Planning)**

Approver(s)

**Karen Abey (Director Strategic and
Regulatory Services)**

Hobart Visitor Accommodation SAP

Response to representations in accordance with Section 40K of the *Land Use Planning and Approvals Act 1993* (LUPA Act)

Prepared by: Emma Riley

Date: 17 September 2026

Table 1 Representations received in relation to the draft amendment before the end of the exhibition period in relation to the draft amendment (s 40K(2)(a))

Representation no. 1	
Representor:	Margaret Dianne Elliffe
Date received:	26/06/2026
Matters raised:	Supports the SAP, suggesting it will slow the growth of the short stay rental accommodation sector, which will improve Hobart's residential amenity and long-term rental availability and affordability.
Consideration of merits:	Support for draft amendment is noted.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 2	
Representor:	Angela McGowan
Date received:	28/06/2026
Matters raised:	Supports the SAP, suggesting the addition of the SAP will slow the growth of the short stay rental accommodation sector, which will improve rental availability and affordability, and residential amenity, and prevent adverse impacts on strata facilities in Hobart.
Consideration of merits:	Support for draft amendment is noted.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 3

Representor:	Chris Irons (obo Owners Corporation Network of Australia Ltd)
Date received:	07/07/2026
Matters raised:	Supports the introduction of the SAP, citing the implications of short stay rental accommodation on strata, given short stay visitors do not have the same investment in amenities or facilities of strata schemes as longer-term residents and owners. Also seeks broader strata reforms, including default six-month minimum strata letting terms in <i>Strata Titles Act 1996</i> (Tas) Model By-Laws.
Consideration of merits:	Support for draft amendment is noted. Changes to the <i>Strata Titles Act 1996</i> (Tas) are a state government legislative matter that is outside the scope of this planning scheme amendment process.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 4

Representor:	Debra Martin-Wells
Date received:	04/07/2026
Matters raised:	Supports the restriction but argues the SAP will be ineffective without stronger enforcement against unregistered and exempt short stay listings. Representor suggests Council records show fewer permits than active listings – particularly in Battery Point. Suggests that compliance, data auditing and registering exempt listings should be a higher priority than the introduction of a new SAP.
Consideration of merits:	Support for draft amendment is noted. Council officers have an ongoing compliance program for short stay accommodation within the local government area that has been a priority and will continue to be so.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 5

Representor:	Andrew Wilson
Date received:	09/07/2026
Matters raised:	Supports banning new whole-home Airbnb/short stay listings, and supports higher rates for existing whole-home listings. Argues that the short-term rental of rooms within someone's home should remain allowed because they do not remove properties from the long-term rental market.
Consideration of merits:	Support for draft amendment is noted. The draft amendment still allows for genuine home sharing including rental of rooms in a person's home through both the state exemption pathway and the proposed acceptable solution under Clause HOB-S11.6.1.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 6

Representor:	Bernd Wechner
Date received:	09/07/2026
Matters raised:	Supports capping short stay rentals, arguing whole-home listings worsen inequality by converting a home into accommodation for wealthier visitors and reducing housing access for longer-term residents looking to rent.
Consideration of merits:	Support for draft amendment is noted.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 7

Representor:	Renato Delfatti
Date received:	09/07/2026
Matters raised:	Opposes restrictions to short stay accommodation, arguing short stays support tourism, local hosts, visitor needs and household incomes. Suggests that the SAP is not backed by evidence that indicates it will result in housing affordability benefits, and cites other cities internationally where rent prices continued to rise after short stay restrictions were introduced (provides New York, Barcelona and Lisbon as examples).
Consideration of merits:	The representation is noted. The contribution that visitor accommodation makes to Hobart's tourism offering is acknowledged. However, the amendment does not prohibit visitor accommodation across Hobart and does not affect existing lawful approvals, hosted accommodation, or exempt accommodation. It is limited to the future conversion of whole dwellings to visitor accommodation within specified residential zones. It is acknowledged that housing affordability and availability challenges have multiple causes and that increasing housing supply is important. However, the amendment is not intended to resolve the housing crisis. Rather, it is a targeted planning measure aimed at reducing the specific issue of ongoing loss of existing residential dwellings to whole dwelling visitor accommodation and maintaining the primary residential function of residentially zoned land. The amendment continues to represent an appropriate planning response to local housing pressures. The matters raised have been considered through the preparation of the amendment and supporting evidence.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 8

Representor:	Lixie Calcagno
Date received:	09/07/2026
Matters raised:	Opposes restrictions, arguing short stays provide essential visitor accommodation during peak periods and support tourism, residents and local businesses. Suggests Hobart already experiences accommodation shortages

	during major events and peak season, and that short stay accommodation provides additional capacity. Argues short stay accommodation supports people travelling for medical treatment, emergencies, work and family visits.
Consideration of merits:	The representation is noted. The contribution that visitor accommodation makes to Hobart's tourism industry and accommodation supply is acknowledged. The amendment does not prohibit visitor accommodation across Hobart, nor does it affect existing lawful approvals or exempt forms of visitor accommodation. The amendment seeks to balance the competing needs between different land uses and maintain housing opportunities for permanent residents. Visitor accommodation will continue to be allowable across most non-residential zones.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 9	
Representor:	Dora von Conrady
Date received:	09/07/2026
Matters raised:	Supports the proposed changes, noting Hobart already has many short stays and needs more long-term rental housing to help the local community with housing. Suggests a reduction in land tax fees for those who offer long term rentals would be an incentive to property owners, and would increase long term rental availability.
Consideration of merits:	Support for draft amendment is noted. Changes to land tax on properties are a state government matter that is outside the scope of this planning scheme amendment process.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 10

Representor: Tricia Dillon

Date received:	09/07/2026
Matters raised:	Opposes restrictions, believing they will be forced to sell or convert their property to a long-term rental. Argues that owners should be able to retain the choice to use their properties for short-term rental, and that as a rental property owner they have had experience with long-term tenants creating property damage and causing them stress.
Consideration of merits:	The representation is noted. The Planning Authority acknowledges the circumstances described by the representor and notes that the draft amendment does not affect existing lawful visitor accommodation uses. If the unit is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. The amendment is not intended to force existing operators to sell their properties or convert them to long term rental accommodation. Rather, it seeks to limit the future conversion of additional whole dwellings to visitor accommodation within specified residential zones and reduce the ongoing loss of existing housing stock from the residential market. The amendment continues to represent an appropriate planning response to local housing pressures.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 11

Representor:	Bowen (Bryan Zhang Z email name)
Date received:	09/07/2026
Matters raised:	Opposes restrictions, arguing they will undermine the legal rights of property owners to decide what they do with their properties. Suggests that the restriction will negatively impact tourism, investment confidence and Hobart's long-term economic growth. Suggests Hobart needs accommodation to support events and future opportunities such as the new stadium. Suggests that housing affordability is complex and believes restricting one part of the accommodation market is unlikely to resolve supply issues.
Consideration of merits:	The representation is noted. The contribution that visitor accommodation makes to Hobart's tourism economy is acknowledged and it is recognised that housing affordability and availability are influenced by multiple factors. However, planning schemes are intended to regulate and manage how land and property may be used in the public interest, including balancing private property rights with broader community objectives. The amendment is not intended to comprehensively address housing supply challenges, nor does it prohibit visitor accommodation throughout Hobart. Rather, it seeks to limit the future conversion of whole dwellings to visitor accommodation within specified residential zones and reduce the ongoing

	loss of existing housing stock from the residential market. Existing lawful visitor accommodation uses are unaffected by the amendment and may continue to operate. The amendment continues to represent an appropriate planning response to local housing pressures.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 12	
Representor:	Merrydith Callegari
Date received:	09/07/2026
Matters raised:	Opposes restriction, favouring enforcement and responsible hosting guidelines while highlighting in-home hosting's income and visitor-support benefits. The representor is a long-term Airbnb host who uses their primary residence to provide short-term accommodation. Argues that effort should be targeted at ensuring the short stay sector has 'responsible hosting guidelines' to protect residential amenity.
Consideration of merits:	The representation is noted. The benefits that short stay accommodation can provide to visitors and hosts, including for purposes beyond tourism, is acknowledged. It is also noted that the representor's hosted accommodation within their principal place of residence is unaffected by the amendment due to the existing exemptions that apply under the State Planning Provisions. While the representation raises concerns about restrictions on property use, planning schemes are intended to provide a framework for regulating how land and property may be used in the broader public interest. The amendment is not intended to prohibit all visitor accommodation, nor is it intended to resolve all housing supply issues. Rather, it seeks to reduce the future loss of existing residential dwellings to whole dwelling visitor accommodation within specified residential zones and maintain housing opportunities for permanent residents. The amendment continues to represent an appropriate planning response to local housing pressures.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 13

Representor:	Clifford Richard Dearden
Date received:	09/07/2026
Matters raised:	Supportive of limiting whole-house short stay rentals, believing they degrade the neighbourhood character and sense of community that are intended under residential zoning.
Consideration of merits:	Support for draft amendment is noted.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 14	
Representor:	Paula Wriedt (obo TasCOSS (Stephen Durney on covering email))
Date received:	10/07/2026
Matters raised:	TasCOSS is supportive of the proposed amendment, suggesting residential housing should primarily be used to meet the housing needs of the community and that restricting the conversion of whole dwellings into visitor accommodation within residential zones aligns with this objective. TasCOSS also indicates the importance of distinguishing between investor-owned whole dwelling short stay accommodation and genuine home-sharing arrangements. TasCOSS recommends policy measures focus on non-primary residence short stay accommodation because these properties represent housing that could otherwise be available for long-term residential rental.
Consideration of merits:	Support for draft amendment is noted. Genuine home sharing opportunities for short stay accommodation are still provided for in the draft amendment including through both the state exemption pathway as well as the proposed acceptable solution under Clause HOB-S11.6.1.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 15

Representor:	Yvonne Buckley
Date received:	11/07/2026
Matters raised:	Opposes a perceived ban on short stay accommodation, suggesting short stay rentals are a flexible option for a diverse range of visitors and are good for the local economy. The representor owns a short stay rental property and suggests that this is a key source of financial support. Believes there is no evidence to suggest the restriction would relieve the housing crisis.
Consideration of merits:	The representation is noted. The Planning Authority acknowledges the contribution that visitor accommodation makes to the visitor economy and recognises that housing affordability and availability are influenced by multiple factors. However, the amendment is not intended to resolve Hobart's housing challenges in isolation, nor does it prohibit visitor accommodation across the municipality. It is also noted that amendment does not affect existing lawful visitor accommodation uses in residential zones. If the representor's property is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. The amendment is not intended to resolve Hobart's housing challenges in isolation. It is a targeted planning measure to reduce the future conversion of existing residential dwellings to whole dwelling visitor accommodation in specified residential zones, while retaining opportunities for visitor accommodation in other locations and circumstances.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 16

Representor:	Xianghong Ma
Date received:	10/07/2026
Matters raised:	Opposes restrictions, arguing they create uncertainty for families who want to invest in property, and that they overlook the broader community and economic benefits of short stay accommodation. Believes the restrictions would disincentivise property investment.
Consideration of merits:	The representation is noted. The Planning Authority acknowledges the contribution that visitor accommodation makes to the visitor economy and recognises that housing affordability and availability are influenced by multiple factors. However, the amendment is not intended to resolve Hobart's housing challenges in isolation, nor does it prohibit visitor accommodation across the municipality.

	It is also noted that amendment does not affect existing lawful visitor accommodation uses in residential zones. If the representor's property is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. The amendment is a targeted planning measure that seeks to reduce the future loss of existing residential dwellings to whole dwelling visitor accommodation within specified residential zones and maintain housing opportunities for permanent residents. The amendment continues to represent an appropriate planning response to local housing pressures.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 17	
Representor:	Xianghong Ma on behalf of the Trustee for Westbrook Residence Trust
Date received:	10/07/2026
Matters raised:	Opposes the SAP, citing investment reliance, conversion costs, impacts on local suppliers and the need for a stable planning system to encourage and support property investors. Argues the proposal is not supported by sufficient evidence.
Consideration of merits:	The representation is noted. The Planning Authority acknowledges the contribution that visitor accommodation makes to the visitor economy and recognises that housing affordability and availability are influenced by multiple factors. However, the amendment is not intended to resolve Hobart's housing challenges in isolation, nor does it prohibit visitor accommodation across the municipality. It is also noted that amendment does not affect existing lawful visitor accommodation uses in residential zones. If the representor's property is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. The amendment is a targeted planning measure that seeks to reduce the future loss of existing residential dwellings to whole dwelling visitor accommodation within specified residential zones and maintain housing opportunities for permanent residents. The amendment continues to represent an appropriate planning response to local housing pressures.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

recommendation (section 40K(2)(c)(ii) of the LUPA Act)

Representation no. 18

Representor: Elizabeth Lamond

Date received: 11/07/2026

Matters raised: Opposes the proposal, arguing that as a short stay host, it supports their independent retirement income, and is relied upon by local businesses and visitors. Argues short stay accommodation supports local hospitality, tourism, retail, cleaning and laundry businesses. Argues that there is limited evidence of benefits to housing supply.

Consideration of merits: The representation is noted. The contribution that visitor accommodation makes to Hobart's tourism economy is acknowledged and it is recognised that housing affordability and availability are influenced by a range of factors. The amendment does not affect existing lawful visitor accommodation uses. If the representor's property is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. The representation raises concerns about the evidence supporting the amendment. Short stay accommodation is not the sole cause of housing affordability or availability pressures, and the amendment is not advanced as a complete solution to Hobart's housing challenges. It is a targeted local planning response intended to reduce the future loss of existing residential dwellings to whole dwelling visitor accommodation within residential zones.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act) No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act) There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 19

Representor: Chris Yan

Date received: 10/07/2026

Matters raised: Opposes broad restrictions and suggests that the proposed measures will burden small-scale local operators. Believes that restricting short-term accommodation will not improve housing supply. Believes that Council should direct their focus to improved compliance, clearer rules and registration requirements.

Consideration of merits: The representation is noted. The contribution that visitor accommodation makes to Hobart's tourism economy is acknowledged and it is recognised that housing affordability and availability are influenced by a range of factors.

	The amendment does not affect existing lawful visitor accommodation uses. If the representor's property is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. The amendment is not intended to address all housing supply issues, nor is it predicated on short stay accommodation being the sole cause of those challenges. Rather, it is a targeted planning response intended to reduce the future loss of existing residential dwellings to whole dwelling visitor accommodation within residential zones and maintain housing opportunities for permanent residents. The amendment is supported by evidence including analysis of housing and rental market conditions, visitor accommodation trends, the independent report prepared by Professor Peter Phibbs and the SGS Economics and Planning cost-benefit assessment.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 20	
Representor:	Tim Gourlay
Date received:	13/07/2026
Matters raised:	Opposes the amendment, arguing that whole dwelling visitor accommodation supports tourism, local businesses and a diverse range of visitors, including families, workers and people travelling for medical purposes. The representation questions whether restricting future visitor accommodation approvals will meaningfully improve housing availability or affordability and contends that housing pressures have multiple causes.
Consideration of merits:	The representation is noted. The contribution that visitor accommodation makes to Hobart's tourism sector and accommodation choice is acknowledged. It is also recognised that housing affordability and availability are influenced by multiple factors. The amendment is not intended to resolve Hobart's housing challenges in isolation. Rather, it seeks to reduce the future conversion of existing residential dwellings to whole dwelling visitor accommodation within specified residential zones and retain housing opportunities for permanent residents. The amendment does not prohibit visitor accommodation across Hobart and does not affect existing lawful visitor accommodation uses. It is therefore considered to strike an appropriate balance between visitor accommodation needs and the primary residential function of residentially zoned land.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

whole, of implementing the recommendation (section 40K(20)(c)(ii) of the LUPA Act)

Representation no. 21

Representor: Jill Jetson-Shumbusho

Date received: 09/07/2026

Matters raised: Opposes restrictions. Representor is an Airbnb host with several properties across Tasmania and cites the importance of host income for their self-funded retirement income. Is concerned the proposal is not supported by sufficient evidence and will negatively impact tourism and disincentivise 'mum and dad' investors. Wants statewide regulatory consistency.

Consideration of merits: The representation is noted. It is acknowledged that many short stay accommodation operators are individual investors rather than large commercial enterprises and that investment decisions are often linked to personal circumstances such as retirement planning, financial security and family support.

However, the purpose of the planning scheme is to balance private interests with broader community outcomes. While the amendment may influence future investment decisions, its primary purpose is to manage land use outcomes within residential zones. Residentially zoned land performs an important function in accommodating Hobart's permanent population and the amendment seeks to reduce the future loss of existing dwellings from the residential housing market. All planning scheme requirements indirectly impact investment decisions.

It is also noted that the amendment does not affect existing lawful visitor accommodation uses. If the representor's property is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment.

In relation to the evidence base, housing affordability and availability pressures have multiple causes and short stay accommodation is not the sole driver of those challenges. The amendment is not advanced as a complete solution to Hobart's housing issues.

While statewide consistency is desirable, the Act allows local provisions where the section 34 LPS criteria are met. This amendment is a targeted local planning response, supported by analysis of Hobart's housing and rental market conditions, visitor accommodation trends, the independent report prepared by Professor Peter Phibbs and the SGS Economics and Planning cost-benefit assessment.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act) No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(20)(c)(ii) of the LUPA Act) There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 22

Representor:	Ian Tolond
Date received:	14/07/2026
Matters raised:	Opposes blanket restrictions, seeking exemptions for specialist disability accommodation used temporarily as accessible short stay accommodation. for visitors with disabilities or complex accommodation needs. Highlights the importance of accessible short stay accommodation particularly those visiting for medical care, or older people.
Consideration of merits:	The representation is noted. The unique circumstances outlined by the representor and the challenges associated with maintaining a purpose-built SDA dwelling where suitable participants have not yet become available is acknowledged. The potential role of short stay accommodation in supporting the financial viability of specialised housing assets is also recognised. However, the draft amendment has been developed to address the broader planning issue of ongoing conversion of residential dwellings to whole dwelling visitor accommodation within residential zones. The amendment applies generally across affected residential areas and is not directed at any particular class of property owner or accommodation provider. While the circumstances of specialised SDA housing are acknowledged, the amendment provides an appropriate planning response at a strategic level. The evidence supporting the amendment relates to the cumulative impact of whole dwelling visitor accommodation on housing availability and residential communities, rather than the individual circumstances of particular properties.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 23

Representor:	Antonia O'Brien
Date received:	14/07/2026
Matters raised:	Opposes further restrictions, arguing locally owned short stay accommodation supports tourism spending, small businesses and their personal self-funded retirement planning. Believes that responsible short stay hosts should not be blamed for housing affordability issues.
Consideration of merits:	The representation is noted. The economic contribution that locally owned short stay accommodation can make to property owners, local businesses and the visitor economy, including the benefits identified by the representor as a small-scale owner planning for retirement, is acknowledged. However, the amendment is not intended to discourage individual investors or prevent existing lawful visitor accommodation uses from continuing. If the representor's property is currently operating lawfully for visitor

	accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. It is agreed that increasing housing supply remains an important part of addressing housing affordability. However, the amendment is not intended to increase housing supply directly. Rather, it seeks to reduce the future loss of existing residential dwellings to whole dwelling visitor accommodation within residential zones. Retaining existing housing stock and facilitating additional housing supply are complementary objectives. The amendment represents an appropriate planning response to local housing pressures.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(20)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 24	
Representor:	Mel Clements (letter signs off as Impeccable Maintenance & Cleaning Services)
Date received:	14/07/2026
Matters raised:	Opposes short stay accommodation restrictions due to potential impacts on their cleaning and maintenance business, local employment and Hobart's visitor economy. Believes that the SAP represents further regulation that may reduce work opportunities, and limit business growth and viability, particularly for small businesses.
Consideration of merits:	The representation is noted. The role that visitor accommodation plays in supporting a range of local businesses, including cleaning, maintenance and property management services associated with the operation of short stay accommodation, is acknowledged. The potential economic contribution of these activities has been recognised in the assessment of the amendment. However, the amendment has been developed to balance economic considerations with the need to maintain housing opportunities for permanent residents within residential zones. The amendment is not intended to prohibit visitor accommodation across Hobart or affect existing lawful visitor accommodation uses. Rather, it seeks to limit the future conversion of additional whole dwellings to visitor accommodation within specified residential zones and reduce the ongoing loss of existing housing stock from the residential market. Notwithstanding the concerns raised regarding potential impacts on businesses servicing the short stay sector, the amendment represents an appropriate planning response to the strategic housing issues identified through the supporting evidence.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 25

Representor:	Matthew (Matt) Greenwood (obo Hands On Maintenance and Joinery)
Date received:	14/07/2026
Matters raised:	Opposes restrictions. The representor operates a maintenance and repair business, and notes that short stay maintenance work provides most of their income. Believes short stay supports broader small-business employment and is concerned that the SAP will undermine small business.
Consideration of merits:	The representation is noted. The specific concerns raised by the representor as a sole trader whose business is closely linked to the short stay accommodation sector is acknowledged. It is recognised that visitor accommodation can support demand for maintenance, cleaning, repair and other property-related services and that changes to the sector may have flow-on effects for businesses providing those services. However, the amendment is a land use planning response aimed at reducing the future conversion of existing residential dwellings to whole dwelling visitor accommodation within residential zones, seeking to better balance competing land use interests. While potential economic impacts have been considered, the amendment strikes an appropriate balance between economic interests and the need to retain housing stock for permanent residents. It is also noted that the amendment does not prohibit visitor accommodation across Hobart and does not affect existing lawful visitor accommodation uses. Accordingly, existing approved visitor accommodation properties may continue to operate.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 26

Representor:	Fiona Britten
Date received:	06/07/2026
Matters raised:	Opposes the amendment in its current form. Suggests Council has not demonstrated the amendment satisfies the relevant LPS criteria. Argues a blanket prohibition on future non-primary residence whole-home visitor accommodation has not been proven to be proportionate or necessary. Argues the cost-benefit analysis assumes displaced visitor demand can be

absorbed by hotels despite evidence of peak-period capacity constraints. Suggests the evidence base does not adequately engage with recent AHURI research.

Consideration of merits:

The representation is noted. It raises a detailed critique of the evidence base, proportionality and statutory justification for the draft amendment.

Housing affordability and availability are influenced by multiple factors, including dwelling supply, construction costs, demographic change, interest rates, population growth and broader housing market conditions. The amendment is not advanced as a comprehensive response to Hobart's housing challenges. It is a targeted local planning measure directed to reducing the future loss of existing residential dwellings to whole dwelling visitor accommodation in the Inner Residential, General Residential and Low Density Residential zones.

The representation argues that the amendment improperly regulates only part of the broader Visitor Accommodation use class. This is not accepted. While Visitor Accommodation is a use class under the planning scheme, there is nothing in the LUPA Act or the structure of the Tasmanian Planning Scheme that prevents a planning instrument from applying different standards to different forms, scales, locations or operational characteristics of a use. Planning schemes commonly regulate different components of a use class differently, including by reference to scale, intensity, location, site characteristics, relationship to other uses, or impacts on surrounding land. The fact that the draft amendment applies to a particular subset of Visitor Accommodation, namely new whole dwelling Visitor Accommodation in specified residential zones, is not of itself inconsistent with the requirements for Local Provisions Schedules under section 32(4) of the Act.

The distinction drawn by the amendment is deliberate. The amendment does not focus on hosted accommodation, primary residence arrangements, secondary residences that fall within existing exemptions, visitor accommodation in non-residential zones, or visitor accommodation associated with new development that does not result in a net loss of dwellings. The amendment is directed to the planning issue identified in the supporting material: the further conversion of existing residential dwellings in residential zones from housing use to whole dwelling visitor accommodation use.

The representation submits that recent data may show a levelling-off in approvals or listings and that this weakens the case for intervention. Short-term movements in listing data and approval activity are relevant context. However, the amendment is not justified solely by an accelerating growth narrative. It is also concerned with the existing stock of whole dwelling visitor accommodation, its cumulative impact on housing availability in a constrained residential market, and the risk of further loss of dwellings from the residential housing market if the planning scheme continues to allow such conversions. Professor Phibbs' response further supports this prospective focus.

The draft amendment does not depend on an assumption that existing approved visitor accommodation properties will return to the long-term rental market, or that all current operators will change their use in response to regulation. Rather, it seeks to prevent further conversions and influence future purchasing and investment decisions over time. The importance of the amendment's prospective effect is demonstrated by the further 70 change of use applications submitted to Council in the month between Council's decision to increase the application fee to \$5,000 and that fee coming into effect on 1 July. That level of activity indicates latent demand for whole dwelling visitor accommodation approvals and reinforces the value of a forward-looking planning control. A levelling-off of listings in one period therefore does not indicate the absence of a strategic planning issue, nor

does it remove the need a prospective planning response to future land use outcomes. Furthermore, the data indicates fluctuations in listings over time.

The representation contends that the Phibbs report establishes scale but not proportionality. Proportionality should be assessed in the context of the amendment's limited operation. The amendment does not retrospectively remove existing lawful visitor accommodation uses, does not prohibit visitor accommodation across Hobart, does not apply to all zones, and does not prevent new housing development that includes visitor accommodation where there is no net loss of dwellings. The amendment is therefore not a blanket prohibition on visitor accommodation. It is a prospective control on a defined form of visitor accommodation in specified residential zones.

The representation also relies on AHURI Final Report No. 460 and submits that the report from Professor Phibbs should have considered this, although it was not published at the time of preparing the reports for this draft amendment.

Notwithstanding this, the relevance of contemporary research concerning short-term rental accommodation is acknowledged. The AHURI report identifies that short-term rental accommodation takes a range of forms and that host motivations extend beyond higher financial returns, including cost recovery, flexible housing needs and second-home use. It also identifies policy approaches including registration, reporting, restrictions on conversion of long-term homes to short-term rental accommodation, spatial controls and financial tools.

The AHURI report does not negate the basis for the amendment. Rather, it reinforces the need for place-specific policy responses informed by local housing market conditions and by the competing demands for short-term and long-term rental housing. To the extent the representation relies on AHURI typologies, care is required in applying those typologies directly to Hobart. Those typologies should not be treated as automatically transferable to the Tasmanian context or as determinative of the appropriate planning response under the Hobart LPS. In any event, the draft amendment does not depend on a proposition that all forms of visitor accommodation have identical impacts. It applies to the particular form of visitor accommodation considered most relevant to the identified planning issue: the conversion of whole dwellings in residential zones that would otherwise remain part of Hobart's residential dwelling stock.

The representation argues that a discretionary assessment pathway should be retained. It is acknowledged that discretionary assessment can be appropriate for many forms of use and development. However, in this case, the concern is cumulative and strategic rather than confined to site-specific impacts. A discretionary assessment pathway is not necessarily well suited to managing the incremental loss of residential dwellings across a municipal housing market, particularly where each individual application may appear acceptable when assessed in isolation. The absence of performance criteria is therefore a deliberate feature of the amendment. It reflects the view that the cumulative impact of ongoing conversions is better managed through a clear prospective planning control.

The representation also refers to existing and proposed measures, including differential rating, higher application fees and a potential statewide levy. These measures are acknowledged, but they serve different purposes from the draft amendment. Rating and levy mechanisms may influence costs, revenue collection or broader policy settings, but they do not provide the same land use outcome as a planning control.

It is also noted that existing short stay accommodation hosts will not necessarily be discouraged through measures such as day caps, taxes or other financial regulation. This is consistent with the position advanced in Airbnb's own documentation, which relies on survey material suggesting that many hosts would not be readily discouraged from continuing short stay accommodation by regulatory or financial measures. That evidence tends to

support, rather than undermine, the rationale for a prospective planning response. Once a property has entered the short stay accommodation market, owners may be difficult to shift from that use. The stronger planning strategy is therefore to prevent further permits for new whole dwelling visitor accommodation in the relevant residential zones, rather than relying on later financial measures to attempt to change established operator behaviour.

The draft amendment is concerned with whether further conversion of whole dwellings to visitor accommodation should continue to be enabled in specified residential zones. Financial measures do not remove the need for a planning response where the relevant land use outcome remains inconsistent with the intended residential function of those zones.

In relation to the SGS cost-benefit analysis, the representation's concern about assumptions relating to accommodation demand and hotel capacity is noted. However, the SGS analysis is one part of a broader evidence base, not the sole basis for the amendment. The amendment has also been informed by housing and rental market data, visitor accommodation trends, planning approval data, the Phibbs report and the statutory assessment undertaken by Era Advisory. Considered as a whole, the supporting material provides an adequate basis to conclude that the amendment is a reasonable and proportionate planning response.

For these reasons, the representation does not demonstrate a failure to satisfy section 32(4) or section 34 of the Act. The amendment responds to particular social, economic and spatial circumstances within the Hobart municipal area and applies a targeted control to a defined category of visitor accommodation in specified residential zones. It is open to a Local Provisions Schedule to regulate different forms of a broader use class where the planning purpose, local circumstances and intended land use outcomes justify that distinction.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 27

Representor: Avril Brown

Date received: 14/07/2026

Matters raised: Opposes the ban, arguing whole-home short stays serve diverse groups including families, workers, students and sporting visitors. Suggests that whole-house short stay accommodation serves demographics that cannot necessarily be easily accommodated by hotels or motels. Concerned that limiting short stay accommodation could affect Hobart's, and Tasmania's, wider economy.

Consideration of merits: The representation is noted. The amendment does not seek to prevent all forms of visitor accommodation within Hobart. Rather, it seeks to reduce the future conversion of existing residential dwellings to whole dwelling visitor accommodation within specified residential zones. In doing so, it seeks to

	balance the accommodation needs of visitors with the need to retain housing stock for permanent residents. The fact that the representor's property has transitioned from short stay accommodation to a long-term rental also demonstrates that some dwellings are capable of moving between the visitor accommodation and residential housing markets. This is one of the matters considered in the evidence supporting the amendment.
--	---

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
--	--

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 28

Representor:	Peter D. McIntosh
---------------------	-------------------

Date received:	14/07/2026
-----------------------	------------

Matters raised:	Supports the amendment, arguing whole-home visitor accommodation undermines residential zoning, housing availability and neighbourhood cohesion. Suggests zoning is important to providing residents with predictability and that short-term rentals reduce homes for families to rent or buy and drive rents up.
------------------------	---

Consideration of merits:	Support for draft amendment is noted.
---------------------------------	---------------------------------------

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
--	--

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 29

Representor:	Wendy Hallett (letter signs off as Hallett's Cleaning and Maintenance)
---------------------	--

Date received:	14/07/2026
-----------------------	------------

Matters raised:	Opposes restrictions, citing major impacts on their cleaning business, employees, visitor spending and Tasmania's small-business economy. Representor suggests that without short stay accommodation, their business could not operate, and is concerned that further regulation could risk undermining small business.
------------------------	---

Consideration of merits:	The representation is noted. The concerns raised differ from many other representations in that they focus on the flow-on effects of visitor accommodation for businesses that provide cleaning, maintenance and employment services to the sector. It is acknowledged that the visitor accommodation industry can support a range of secondary businesses and local employment opportunities, including the representor's business and workforce. However, the amendment is not intended to remove existing lawful visitor accommodation or prevent visitor accommodation throughout Hobart. Rather, it is directed at limiting the future conversion of existing residential dwellings to whole dwelling visitor accommodation within specified residential zones. The potential economic implications of the amendment have been considered alongside its housing and community objectives as part of the supporting analysis. While the concerns regarding impacts on businesses servicing the short stay accommodation sector are acknowledged, they are not considered to outweigh the strategic objective of retaining housing stock for permanent residents within residential zones, noting the ongoing potential for visitor accommodation to occur in a range of non-residential and mixed use zones across the City.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 30

Representor:	Colleen Reardon (obo Tasmanian Chamber of Commerce & Industry)
Date received:	14/07/2026
Matters raised:	Opposes the amendment, arguing housing supply is the key issue and that they believe the proposed SAP does not improve housing supply. Suggests restrictions risk economic and regulatory impacts. Concerned that restrictions at the municipal level will create inconsistency with Tasmania's statewide visitor accommodation framework.

Consideration of merits:	The representation is noted. The submission raises broader economic and policy considerations regarding housing supply, regulatory consistency and the role of visitor accommodation in supporting Tasmania's economy. It is acknowledged that increasing housing supply is critical to improving housing affordability and availability. However, the amendment is not advanced as a substitute for housing supply measures, nor is it premised on visitor accommodation being the sole cause of housing pressures. Rather, it is a targeted planning response to a specific land use issue: the ongoing conversion of existing residential dwellings to whole dwelling visitor accommodation within residential zones. Measures that facilitate additional housing supply and measures that seek to retain existing housing stock have complementary objectives and may operate together to support housing outcomes.
---------------------------------	---

The submission contends that the evidence does not demonstrate the amendment will achieve its stated objectives. This is not accepted. The amendment is supported by a range of evidence, including analysis of housing and rental market conditions, visitor accommodation trends, the independent report prepared by Professor Peter Phibbs, and the SGS Economics and Planning cost-benefit assessment. Collectively, these documents identify a relationship between the growth of whole dwelling visitor accommodation and the loss of housing opportunities within Hobart's residential zones, and accordingly support a strategic planning response.

The submission also raises concerns regarding regulatory duplication and consistency with the statewide framework. While the statewide framework regulates the operation and registration of short stay accommodation, the purpose of the planning scheme is to regulate land use and development. The existence of a statewide framework does not preclude a local planning response where particular local circumstances justify one. Indeed, this is specifically provided under section 32 of the Act. The amendment has been developed specifically as a response to local conditions identified within the Hobart municipal area and is directed to the use of land within residential zones rather than the broader regulation of the short stay accommodation industry. It is considered to satisfy the LPS criteria under the Act.

The importance of visitor accommodation to Hobart's visitor economy is acknowledged. However, the amendment does not prohibit visitor accommodation across Hobart, does not affect existing lawful visitor accommodation uses and does not apply to visitor accommodation in business, commercial, mixed use or other non-residential zones. The amendment is instead directed to future conversions of existing whole dwellings within specified residential zones, reflecting the need to balance economic benefits with the primary role of residential zones in accommodating permanent residents.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 31

Representor:

Yoav Tourel (obo Australia and New Zealand Short-Term Rental Association (ASTRA))

Date received:

15/07/2026

Matters raised:

Opposes the amendment in its current form, favouring statewide, evidence-based regulation, targeted compliance and recognition of visitor accommodation's broader uses. Suggests that there is insufficient evidence that the SAP would produce housing benefits, that there will be for potential regulatory complexity and impacts to Tasmania's visitor economy. Concerned that the restriction may reduce flexibility for ordinary property owners.

Consideration of merits:

The representation is noted. The representation raises concerns regarding the relationship between the proposed amendment and Tasmania's existing statewide framework, the evidence supporting the amendment, the broader

role of visitor accommodation, cumulative regulatory impacts and potential effects on the visitor economy.

It is acknowledged that Tasmania has an established statewide framework regulating short stay accommodation and that this framework plays an important role in registration, reporting and operational regulation of visitor accommodation. However, the existence of a statewide framework does not preclude the application of local planning controls where local circumstances justify a more specific land use response. The purpose of the draft amendment is not to regulate the operation of the visitor accommodation industry generally, but to address the land use consequences associated with the ongoing conversion of existing residential dwellings to whole dwelling visitor accommodation within particular residential zones in Hobart.

The submission contends that the amendment assumes restricting future whole dwelling visitor accommodation will improve housing outcomes without adequately demonstrating the benefit. It is accepted that housing affordability and availability are influenced by multiple factors and that visitor accommodation is not the sole cause of housing pressures. However, the amendment is not presented as a comprehensive solution to housing affordability. Rather, it is a targeted planning response intended to reduce the future loss of existing residential dwellings from the residential housing market. The supporting material, including the independent report prepared by Professor Peter Phibbs, SGS cost-benefit analysis and broader housing market analysis, identifies a relationship between the growth of whole dwelling visitor accommodation and the reduction of available housing stock within residential zones and provides an evidentiary basis for intervention.

The submission also argues that many visitor accommodation properties are used flexibly and would not necessarily become long term rental housing if visitor accommodation opportunities were restricted. This point is acknowledged. However, the amendment is prospective in nature and is not dependent on all existing visitor accommodation properties returning to the long-term rental market. Its primary purpose is to reduce the future conversion of additional residential dwellings to whole dwelling visitor accommodation and thereby retain housing opportunities that may otherwise be lost over time.

The representation highlights the role of visitor accommodation in supporting medical stays, workforce accommodation, family visits, temporary relocation, events and tourism. These broader accommodation functions are acknowledged. However, the accommodation needs of workers, including construction workers, project staff and essential workers, do not necessarily depend on visitor accommodation approvals. Where accommodation is occupied on a longer-term basis and functions as a person's place of residence rather than visitor accommodation, it may already meet the requirements of a residential use under the planning scheme. The amendment therefore does not necessarily remove accommodation opportunities for longer-term workforce accommodation. It also does not prohibit visitor accommodation throughout Hobart. Existing lawful visitor accommodation uses are unaffected and may continue to operate. Visitor accommodation will continue to be available in a range of commercial, business and mixed-use locations, through hosted accommodation arrangements and through exemptions contained within the State Planning Provisions. The amendment therefore seeks to maintain accommodation diversity while recognising the primary role of residential zones in accommodating permanent residents.

The submission raises concerns regarding cumulative regulatory impacts, including differential rating, increased application fees, state reporting requirements and the proposed short stay levy. While these measures are acknowledged, they serve different policy purposes and do not address the underlying land use issue that is the subject of the amendment. Rating structures, levies and reporting requirements influence financial and regulatory settings, whereas the amendment addresses whether the future

conversion of existing residential dwellings to whole dwelling visitor accommodation should continue to occur within specified residential zones.

In relation to existing operators and transition arrangements, the amendment does not affect existing lawful visitor accommodation uses or remove existing use rights. Properties lawfully operating for visitor accommodation purposes may continue to do so. The amendment is directed at future approvals and future land use outcomes and will not apply retrospectively to existing operators.

The submission suggests that targeted compliance and amenity measures should be preferred to broader planning controls. Such measures can assist in addressing issues such as noise, parking, waste and operational behaviour. However, the issue identified through the strategic work supporting the amendment is not limited to amenity impacts. Rather, it concerns the cumulative effect of the conversion of residential dwellings to visitor accommodation on housing availability and residential communities. Compliance and amenity tools do not directly address that strategic land use issue.

The concerns raised regarding impacts on tourism and accommodation capacity are acknowledged. However, the amendment is not a sweeping prohibition on visitor accommodation across Hobart and will not affect the broad range of visitor accommodation opportunities that will remain available within and outside the affected residential zones. The supporting studies also considered both housing and economic factors, including tourism impacts, in reaching their conclusions.

The matters raised do not demonstrate that the amendment fails to satisfy the LPS criteria under section 34 of the Act, or that modification is required.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 32

Representor: Ben and Pen Clark

Date received: 15/07/2026

Matters raised: Supports PSA-25-3 as a clear, proportionate response to whole dwelling visitor accommodation in residential zones. Argue that the amendment protects affordable, well-located longer-term rental housing and preserves genuine home-sharing opportunities. Representors support the visitor economy but believe visitor accommodation should not come at the expense of affordable rental housing for the community.

Consideration of merits: Support for draft amendment is noted.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 33

Representor:	Michael Varney
Date received:	15/07/2026
Matters raised:	Opposes the amendment, arguing ratepayers should decide and questioning the robustness of evidence, compensation and impacts on future accommodation demand. Concerns are raised regarding the timing of the amendment, private property rights, the relationship between visitor accommodation and housing availability, and potential impacts on tourism and future accommodation demand associated with major events and infrastructure projects. Believes it is inappropriate to pursue the amendment this close to local government elections.
Consideration of merits:	The representation is noted. The amendment has been prepared and exhibited in accordance with the statutory process established under the Act, which includes a public exhibition and representation process. Decisions regarding planning controls are made through that legislative framework rather than by public poll. The amendment does not remove existing lawful visitor accommodation uses and does not require existing lawful operations to cease. Rather, it is directed to future conversions of whole dwellings to visitor accommodation within specified residential zones. The amendment is also not based solely on evidence from other jurisdictions, but is informed by Hobart-specific analysis of housing, rental and visitor accommodation trends, together with supporting expert reports. It is a local response to a local planning issue. While the potential role of visitor accommodation in supporting tourism demand is acknowledged, the amendment seeks to balance these considerations with the need to retain housing opportunities for permanent residents within residential zones.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 34

Representor:	Jennifer Jarrett
Date received:	16/07/2026

Matters raised:	Opposes the amendment, arguing it would harm tourism and reduce affordable visitor options. Suggests property owners rely on short stay income to manage cost-of-living pressures. Believes the amendment unfairly implies short stay hosts are to blame for rental housing shortages.
Consideration of merits:	The representation is noted. The concerns raised regarding tourism, accommodation choice, the role of short stay accommodation in supporting household income, and future accommodation demand associated with major events are acknowledged. The amendment is not intended to prohibit visitor accommodation across Hobart, nor does it affect existing lawful visitor accommodation uses. Rather, it seeks to limit the future conversion of existing residential dwellings to whole dwelling visitor accommodation within specified residential zones. It is also acknowledged that housing affordability and availability are influenced by a range of factors. The amendment is not presented as a complete solution to those challenges, but as a targeted planning response aimed at reducing the ongoing loss of existing housing stock from the residential market. The amendment has been informed by Hobart-specific housing, rental and visitor accommodation analysis together with supporting expert reports.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 35

Representor:	Robert Mallett (obo Hobart Chamber of Commerce)
Date received:	16/07/2026
Matters raised:	Opposes PSA-25-3 in its current form, arguing it relies on untested assumptions and would harm small businesses, tourism and investment without improving housing supply. Suggests that SGS's cost-benefit analysis relies on unsupported assumptions – in particular that short stay rentals will become permanent housing and that lost visitor accommodation potential can be supplied by hotels or serviced apartments. Suggests that Council should pursue other housing supply measures and remain consistent with the statewide short stay framework.
Consideration of merits:	The representation is noted. The submission raises detailed concerns regarding the economic evidence supporting the amendment, the role of short stay accommodation within Hobart's economy, the interaction between housing policy and tourism, and the assumptions underpinning the SGS cost-benefit analysis. The submission repeatedly contends that the amendment will not increase housing supply and that Hobart's housing challenges are primarily the result of insufficient dwelling construction. It is accepted that increasing housing supply is critical to addressing housing affordability and availability. However, the amendment is not intended to increase housing supply directly, nor is it

advanced as a complete solution to Hobart's housing challenges. Rather, it is a targeted planning response aimed at reducing the future loss of existing residential dwellings to whole dwelling visitor accommodation within residential zones. Measures that support the delivery of new housing and measures that seek to retain existing housing stock operate in different ways and can be pursued concurrently.

The submission also argues that the supporting evidence assumes that every dwelling prevented from becoming visitor accommodation will become long-term housing. This is not considered to accurately characterise the rationale for the amendment. While there is uncertainty regarding the future use of any individual property, the amendment is concerned with the cumulative effect of ongoing conversions over time rather than the future use of specific dwellings. The strategic planning issue identified through the supporting work is the continued reduction of the pool of dwellings available for residential occupation within residential zones. The amendment seeks to limit further losses from that pool.

In relation to the SGS cost-benefit analysis, the concerns regarding assumptions and methodology are acknowledged. The SGS report is only one component of the evidence base supporting the amendment. The amendment has also been informed by analysis of housing and rental market conditions, visitor accommodation trends, planning approval data and the independent work undertaken by Professor Peter Phibbs. The decision to progress the amendment is not solely dependent on any single assumption or conclusion contained within the SGS report.

The submission places significant emphasis on the economic contribution of short stay accommodation, including impacts on tourism operators, hospitality businesses, trades, cleaners, property managers and other service providers. These broader economic benefits are acknowledged and were considered through the supporting work, including the SGS assessment. However, the amendment does not prohibit visitor accommodation throughout Hobart, does not apply to existing lawful visitor accommodation uses, and does not apply to visitor accommodation in business, mixed-use or commercial areas. The amendment is directed only at future whole dwelling visitor accommodation conversions within specified residential zones. Accordingly, it is considered that the amendment strikes an appropriate balance between economic considerations and the need to maintain housing opportunities for permanent residents.

The submission also raises concerns regarding workforce accommodation, accommodation associated with major events, and future tourism demand. These matters are acknowledged. However, accommodation used by workers on a longer-term basis, including construction workers, project staff, locum professionals and essential workers, may in some circumstances constitute a residential use rather than visitor accommodation, depending on the nature and duration of occupation. Further, the amendment does not remove existing visitor accommodation capacity, and a broad range of visitor accommodation options will continue to be available throughout Hobart.

Finally, the submission raises concerns regarding consistency with the statewide framework and cumulative regulatory impacts. While these concerns are acknowledged, the statewide framework primarily addresses registration, reporting and operational matters. The proposed amendment addresses a distinct land use planning issue concerning the future conversion of residential dwellings within particular residential zones of Hobart. The existence of a statewide framework does not prevent the application of local planning controls where they are justified by local circumstances.

Having regard to the above, the matters raised in the submission do not demonstrate that the amendment fails to satisfy the LPS criteria or that modification of the amendment is required.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 36

Representor:	Jade Hoskins (obo Airbnb)
Date received:	16/07/2026
Matters raised:	The representation objects to draft amendment PSA-25-3 and requests that Council decline to proceed with the proposed Hobart Visitor Accommodation Specific Area Plan. The representation argues that: • short stay accommodation supports local hosts, tourism, events, vulnerable accommodation needs and the broader Tasmanian economy; • the amendment is not supported by sufficient evidence linking whole dwelling visitor accommodation to Hobart's housing availability and affordability issues; • the amendment will not materially increase long-term housing supply, because many short stay properties would not otherwise be available as long term rentals; • Tasmania's existing statewide short stay accommodation framework is sufficient; • the proposed SAP is not a permissible or appropriate planning tool under the Act. • the amendment is inconsistent with the objectives of Act, adjacent municipal LPSs, the Southern Tasmania Regional Land Use Strategy, the Capital City Strategic Plan and the Tasmanian Planning Policies; and • the amendment will create a two-tiered system between existing permit holders and future property owners.

Consideration of merits:	The draft amendment has a targeted and limited purpose. It seeks to restrict the circumstances in which a new use of a whole dwelling for Visitor Accommodation may occur in the Inner Residential, General Residential and Low Density Residential zones. It does not prevent the use of part of a person's primary residence or a secondary residence for visitor accommodation where existing exemptions in the State Planning Provisions apply. It also does not affect the status of Visitor Accommodation in business, commercial, mixed-use or other non-residential zones, nor does it alter the existing locally specific provisions applying to Battery Point. The representation emphasises the economic and tourism role of short stay accommodation. That role is acknowledged. The amendment is not predicated on a finding that visitor accommodation has no economic value. Rather, the amendment seeks to balance the economic role of visitor accommodation with the role of the planning system in supporting housing availability, residential function and the ongoing character of residential communities. The supporting report prepared by Era Advisory identifies that the amendment responds to the particular circumstances of the Hobart
---------------------------------	---

municipal area and should not be treated as a broader policy position opposed to visitor accommodation generally.

The representation argues that Hobart's housing challenges are primarily caused by insufficient dwelling supply and that restricting new whole dwelling visitor accommodation will not, of itself, resolve those broader issues. It is accepted that short stay accommodation is not the sole cause of housing affordability or availability pressures. However, the fact that housing pressure has multiple causes does not mean that planning controls cannot be introduced to address one identified contributor. The purpose of the amendment is not to solve Hobart's housing challenge in isolation, but to limit the further loss of residential dwellings to whole dwelling visitor accommodation in residential zones where the planning purpose of the land is primarily residential, particularly given the constraints on available rental housing stock.

The representation questions whether existing short stay dwellings would return to the long-term rental market if the amendment proceeds. It refers to commentary by Professor Phibbs acknowledging that changes in rental markets following short stay accommodation regulation are difficult to analyse because short stay listings are only one factor affecting market outcomes. That limitation is acknowledged. However, the relevance of that commentary must be understood in context.

The draft amendment is not directed to day caps, levies or outright bans on existing short stay accommodation operators, nor is it dependent on the assumption that all existing short stay properties would convert to long-term rental housing. Rather, its purpose is prospective. The draft amendment seeks to prevent the further conversion of whole dwellings in residential zones to visitor accommodation, thereby retaining a future pool of dwellings that may otherwise be removed from the long-term residential market.

While individual ownership decisions will vary, preventing new whole dwelling visitor accommodation approvals in residential zones is likely to influence future purchasing and investment behaviour over time. In particular, properties that might otherwise have been purchased or retained for flexible short stay use will be more likely to remain available for residential occupation or long-term rental. The draft amendment therefore seeks to change housing outcomes over the longer term by reducing future loss from the residential housing stock, rather than relying on the return of existing approved visitor accommodation properties to the long-term rental market.

The representation also raises data from YouGov research¹ that shows around 60% of short stay properties would never have been available for long-term rental. The report from Professor Phibbs refers to an estimate of 50% so the data difference in itself is not significant, however it should also be noted that it is not clear whether the YouGov survey included any respondents from Tasmania or more specifically the Hobart LGA, and therefore whether it is representative of broad views from across Australia. A high proportion of Airbnbs across Australia are second homes located in key holiday settlements (colloquially referred to as shacks in Tasmania), are long term family holdings and understandably are unlikely to be converted to long term rentals. This reinforces why the draft amendment is a response to local conditions in Hobart.

The representation also submits that the evidence does not justify the amendment and raises concerns about the Phibbs report, including the difficulty of isolating the effect of short stay accommodation from other housing market factors. The supporting material before Council does not rely on a single source of evidence. As the Council report states, the amendment is informed by housing and rental market data, tourism trends, existing visitor

¹ YouGov Hosts Survey (2015) Available from <https://news.airbnb.com/wpcontent/uploads/sites/4/2025/08/YouGov-survey-Airbnb-host-survey.pdf>

accommodation supply, planning approvals, the supporting expert advice of Professor Peter Phibbs, and the cost-benefit analysis prepared by SGS Economics and Planning. The SGS analysis concludes that, on a per-dwelling basis, restricting further conversion of dwellings to short stay visitor accommodation in residential zones delivers a clear net community benefit. On this basis, the evidence base is considered sufficient to support certification and progression of the amendment.

The representation argues that the statewide regulatory framework is sufficient and that further municipal planning controls are unnecessary. The existence of a statewide framework does not preclude a local planning response where local circumstances justify it and where the draft amendment is capable of satisfying the LPS criteria. The amendment has been prepared as a local response to the particular housing, rental and visitor accommodation conditions present in Hobart. The legislative framework expressly allows for local provisions, including specific area plans, where the relevant statutory criteria are met. This was specifically recognised on the record in Hansard in questions put by the Hon Ruth Forrest to the former Leader of the Government in the Legislative Council, the Hon Leonie Hiscutt².

The representation submits that the SAP is not permissible under section 32(4) of LUPAA and does not satisfy the LPS criteria in section 34. This is not accepted. The Era Advisory report concludes that the amendment is generally in accordance with these requirements and provides an assessment against the LPS criteria. The Planning Authority Committee report also records that Council was satisfied that the draft amendment met the LPS criteria specified in section 34 and resolved to certify the amendment under section 40F. The representation does not identify a matter that requires modification to the draft amendment to meet those criteria.

The representation also argues that the amendment will create inconsistency between Hobart and adjacent municipal areas. This concern is acknowledged. However, section 34 requires consistency and coordination with adjacent LPSs “as far as practicable”; it does not require identical planning controls across municipal boundaries. Hobart performs a distinct capital city role and has particular housing, rental, visitor accommodation and land supply circumstances. A local planning response may therefore be justified even where adjacent municipal areas do not have equivalent provisions.

The representation’s concerns about tourism, major events, medical stays, insurance-related stays and other non-leisure uses are acknowledged. However, the amendment does not remove visitor accommodation as a use from the Hobart planning scheme. It will continue to allow visitor accommodation in a range of non-residential zones, will support genuine home sharing for short stay in residential zones and will not affect existing approvals. The amendment is directed to new whole dwelling visitor accommodation in residential zones, where the cumulative planning consequences for housing supply and residential communities are most acute.

The representation raises fairness concerns about existing approvals being retained while future approvals are restricted. This is an inherent feature of many planning scheme amendments. The planning system commonly distinguishes between existing lawful uses and future use or development. The existence of existing approvals does not prevent the planning authority from determining that future conversions should be more carefully limited in order to achieve a legitimate planning objective.

² https://www.parliament.tas.gov.au/_data/assets/pdf_file/0021/56424/lc20tuesday201820october202022.pdf

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 37

Representor:	Benjamin Price (obo Housing Industry Association Ltd (HIA))
Date received:	16/07/2026
Matters raised:	Opposes the SAP and submits that: • Tasmania's housing affordability challenges arise primarily from inadequate housing supply, land availability, infrastructure constraints, construction costs and broader market factors; • restrictions on visitor accommodation will not increase housing supply and may negatively affect both the visitor accommodation market and residential housing market; • the most effective response to housing affordability pressures is facilitating additional housing construction; • visitor accommodation provides a range of benefits beyond tourism, including temporary accommodation for workers, people receiving medical treatment and people relocating; • the SGS cost-benefit analysis is incomplete and inadequately considers alternative research regarding the impacts of short-term rental accommodation on housing markets; • recent and proposed State Planning Provisions reforms facilitating additional residential development reduce the relevance of assumptions underpinning the SGS analysis; and • the amendment will increase the cost of both short-term and long-term accommodation while frustrating market outcomes.

Consideration of merits:	The representation is noted but is not considered to warrant modification or abandonment of the draft amendment. The representation raises that Hobart's housing challenges are influenced by a broad range of factors, including housing supply, construction costs, population growth, land availability and wider economic conditions. This assertion is accepted. However, it is not contended in the draft amendment and supporting documentation that visitor accommodation is the sole cause of housing affordability or housing availability pressures. Nor is the amendment intended to operate as a comprehensive solution to those broader challenges. The amendment is not intended to increase housing supply directly. Its purpose is to reduce the future loss of existing residential dwellings to whole dwelling visitor accommodation in residential zones and to maintain housing opportunities for permanent residents in those areas. The representation repeatedly argues that increased housing construction represents the most effective response to housing shortages. It is acknowledged that facilitating additional housing supply is an important component of addressing housing affordability and availability issues.
---------------------------------	--

However, measures that support future housing delivery and planning measures that seek to retain existing housing stock are not mutually exclusive. Both approaches may operate concurrently to support broader housing objectives. Moreover, construction of additional housing supply is beyond the scope of a single planning scheme amendment, particularly given the well-documented delivery challenges present not only in Hobart but more broadly.

The draft amendment does not seek to prevent the construction of new housing. Nor does it seek to prevent visitor accommodation throughout Hobart. The amendment applies only to new whole dwelling visitor accommodation uses in specified residential zones, and continues to allow visitor accommodation in a range of other zones and circumstances. It is a targeted intervention directed at maintaining the residential function of land within residential zones rather than a broad restriction on tourism or short stay accommodation.

The representation suggests that restrictions on visitor accommodation will not materially increase housing supply. The draft amendment is not predicated on an assumption that every dwelling prevented from conversion to visitor accommodation will necessarily become available as long term rental housing. Rather, the amendment seeks to ensure that additional residential dwellings are not progressively removed from the housing stock available for permanent residential occupation in the future, particularly given the evidence regarding impact on rental housing. In this respect, the amendment is fundamentally concerned with reducing future loss of housing stock rather than with generating a significant increase in housing supply. This distinction is important when considering the objectives and anticipated outcomes of the amendment.

The representation also submits that visitor accommodation serves a range of functions beyond tourism, including accommodation for workers, medical visitors and people requiring temporary accommodation. These benefits are acknowledged. However, the amendment does not remove visitor accommodation as a land use from the planning scheme. Visitor accommodation will continue to be available throughout Hobart, including within commercial and mixed-use locations, through existing lawful visitor accommodation premises, through exempt forms of visitor accommodation provided for under the State Planning Provisions and through home-sharing opportunities in the acceptable solution HOB-S11.6.1 under the draft amendment.

The representation challenges the conclusions of the SGS cost-benefit analysis and cites alternative research concerning short-term rental accommodation impacts. It is noted that the amendment has been informed by multiple sources of evidence, including housing market analysis, visitor accommodation data, the Phibbs report and the SGS cost-benefit assessment. The SGS analysis concludes that, on a per-dwelling basis, limiting the future conversion of residential dwellings to short stay visitor accommodation delivers a net community benefit when housing, economic and social factors are considered collectively. The existence of differing academic views regarding the magnitude of impacts does not invalidate the broader evidence base supporting the amendment.

The representation further submits that recent planning reforms intended to increase housing development should reduce concerns regarding the loss of dwellings to visitor accommodation. While measures that facilitate additional residential development are supported, it is not considered that future housing supply initiatives eliminate the need to protect existing housing stock, particularly rental housing stock, where there is evidence of forecasted continuing pressure on housing availability and affordability. Additional housing supply and retention of existing housing stock are complementary planning objectives rather than alternative or competing approaches.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 38

Representor:	Suzanne Solvyns
Date received:	16/07/2026
Matters raised:	Opposes the ban, arguing family-used second homes would not become rentals and Council should instead audit permits and exemptions. Feels it is unfair to blame property owners for housing supply failures.
Consideration of merits:	The representation is noted. The concerns raised regarding second homes that are used regularly by owners and their families, together with the role that short stay accommodation income can play in assisting with ownership and maintenance costs, are acknowledged. The amendment is not intended to affect existing lawful visitor accommodation uses. If the representor's property is currently operating lawfully for visitor accommodation purposes, that use may continue and would not be required to cease as a result of the amendment. The amendment instead seeks to limit the future conversion of additional dwellings to whole dwelling visitor accommodation within specified residential zones. The comments regarding compliance, auditing of existing approvals and ensuring that visitor accommodation listings are operating in accordance with the planning scheme are noted. However, such matters relate primarily to the administration and enforcement of existing planning controls rather than the merits of the proposed amendment itself. While the economic and tourism benefits identified by the representor are acknowledged, the amendment seeks to balance those benefits with the objective of retaining housing opportunities for permanent residents within residential zones.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 39

Representor:	Andrew Duffy (obo Holiday Rental Hosting)
---------------------	---

Date received:	16/07/2026
Matters raised:	Opposes broad restrictions. Representor manages around 50 short stay properties around Greater Hobart and is concerned about the impact of the amendments on professionally managed short stays, local suppliers, visitor spending and flexible accommodation needs.
Consideration of merits:	The representation emphasises the economic contribution of short stay accommodation and the benefits it provides to property owners, service providers and the visitor economy. These benefits are acknowledged and were considered in preparation of the amendment. However, the amendment does not seek to prohibit visitor accommodation generally, nor does it affect existing lawful operations. Rather, it seeks to manage the future conversion of residential dwellings to visitor accommodation within residential zones. The representation also suggests restrictions may reduce accommodation choice for visitors and have flow-on impacts for local businesses. While this possibility is recognised, the amendment has been developed in response to evidence indicating that the continued growth of whole dwelling visitor accommodation can affect housing availability and affordability in a constrained housing market. The amendment seeks to balance support for the visitor economy with the need to retain housing opportunities for residents.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(20)(c)(iii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 40

Representor:	Zac Kaye (obo Kaye Cleaning Solutins and Kaye's Property Group (incl petition) 16/07/2026
Date received:	16/07/2026
Matters raised:	Opposes the SAP, arguing it restricts property rights, creates barriers for new investors and harms small businesses supported by short stay rentals. Suggests housing issues should be addressed through supply, approvals and infrastructure rather than limiting lawful property use. Also attaches a petition signed by 15 people.
Consideration of merits:	The representation argues that housing affordability is driven by a range of factors, including housing supply, planning controls, infrastructure provision and development costs, and contends that restricting visitor accommodation is not an appropriate response. It is acknowledged that housing affordability is influenced by multiple interacting factors and that increasing housing supply remains an important part of addressing housing pressures. However, the amendment has been developed on the basis that housing supply is influenced not only by the number of dwellings constructed, but also by how available housing stock is utilised. The amendment seeks to reduce future conversions of current residential dwellings to visitor

	accommodation within residential zones, thereby supporting the retention of housing stock for ongoing residential use. The representation also raises concerns regarding property rights and investment certainty. While these concerns are acknowledged, the planning system necessarily regulates the use and development of land in pursuit of broader strategic planning and community objectives. The amendment is considered an appropriate planning response to identified housing pressures and does not affect existing lawful visitor accommodation operations.
--	---

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 41

Representor: Kim Bomford (obo Shelter Tasmania)

Date received: 16/07/2026

Matters raised: Supports the amendment, citing rental stress, low vacancy rates and evidence that short stay rentals reduce long term rental availability. Suggests that a growth in the short stay visitor accommodation sector has reduced the availability of private longer-term rental properties, and increased rents which disproportionately impacts lower-income households. Supports council managing/limiting whole-home short stay accommodation where there is a shortfall of homes for residents.

Consideration of merits: Support for draft amendment is noted.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 42

Representor: Tom Gibson (obo Little City Group)

Date received: 16/07/2026

Matters raised: Opposes the amendment, arguing permit data overstates rental impacts. Suggests that there is limited crossover between long-term and short-term rental property markets and that council should not assume that short stay properties would become long term rental properties if restrictions were

	implemented. Seeks consultation with council, as well as certainty for operators and compliance-based alternatives to the proposed restrictions.
Consideration of merits:	The representation questions whether restricting future visitor accommodation approvals will result in additional long term rental housing and suggests that permit numbers may overstate the scale of active visitor accommodation. It also argues that many property owners would not place their properties into the long-term rental market even if visitor accommodation opportunities were reduced. It is acknowledged that individual property owners may have differing motivations and that not every dwelling used for visitor accommodation would otherwise enter the long-term rental market. However, the amendment is not premised on the assumption that every visitor accommodation dwelling would become a rental property. Rather, it seeks to reduce the ongoing conversion of current residential housing stock to visitor accommodation, and influence future housing outcomes over time. The representation also highlights the role of short stay accommodation in accommodating workers, families and other temporary visitors. These functions are recognised. However, the amendment does not apply to existing lawful visitor accommodation operations, nor does it prevent visitor accommodation opportunities being provided through other planning pathways. The amendment instead seeks to ensure that residential zones continue to fulfil their primary role of providing housing for residents in circumstances where housing availability and affordability have become significant community concerns.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
Representation no. 43	
Representor:	Margaret Taylor (obo Council of Hobart Community Associations)
Date received:	16/07/2026
Matters raised:	Supports the SAP, citing AHURI and Phibbs research on rental loss, affordability impacts and the need for local planning controls. Notes AHURI's research that indicates Hobart's prevailing regulatory framework has been insufficient in preventing loss of long-term rental properties to short-term rental accommodation. Argues tourism should not come at the expense of longer-term rental housing, amenity and community welfare.
Consideration of merits:	Support for draft amendment is noted.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 44

Representor:	Tom Fyshe (obo THFEC Pty Ltd)
Date received:	16/07/2026
Matters raised:	Opposes further regulation, stating short stays support their electrical business, local jobs, visitor spending and Hobart's small-business economy. Concerned that regulation of flexible short stay accommodation will undermine small business, reduce visitor spending and negatively impact the economy. Notes that similar restrictions have not worked elsewhere.
Consideration of merits:	The representation contends that short stay accommodation supports local businesses, employment and the visitor economy, and argues that further regulation may adversely affect economic activity. The contribution of the visitor economy to Hobart and the broader Tasmanian economy is acknowledged. However, the amendment does not remove existing lawful visitor accommodation opportunities and is not intended to reduce current accommodation supply. The representation also suggests that housing affordability issues should be addressed through alternative measures and refers to outcomes in other jurisdictions. While a range of policy responses may contribute to improved housing outcomes, the planning authority must consider the circumstances of Hobart's housing market and whether the planning scheme appropriately balances visitor accommodation with residential housing needs. The amendment responds to identified concerns regarding the continued conversion of current residential dwellings to visitor accommodation and seeks to retain housing opportunities within residential zones. The potential economic benefits associated with visitor accommodation have been considered as part of the amendment process. On balance, it is considered that the amendment strikes an appropriate balance between supporting the visitor economy and maintaining housing opportunities for residents.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
--	--

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 45

Representor:	Phil Papps (obo TasWater)
Date received:	23/06/2026

Matters raised:	TasWater does not object to the proposed amendment to the Planning Scheme and has no formal comments for the Tasmanian Planning Commission in relation to this matter and does not require to be notified of nor attend any subsequent hearings as stated in the Submission to Planning Authority Notice.
Consideration of merits:	TasWater's comments are noted.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Table 2 Representations received in relation to the draft amendment after the end of the exhibition period in relation to the draft amendment (s 40K(2)(b))

Representation no. 46

Representor:	Rhonda Trotman (member of STAAA)
Date received:	23/07/2026
Matters raised:	Opposes the amendment, arguing that Council has not demonstrated sufficient empirical evidence of short stay accommodation's harm to residential amenity or that the amendment will materially improve housing availability or affordability. Raises concern that existing lawful visitor accommodation uses will retain use rights and therefore will not necessarily return to the long-term rental market. The representor also argues that some properties used for short stay accommodation would not otherwise be made available as long term rentals, and that rental bond data does not support a direct causal link between short stay accommodation and reduced long term rental supply in Hobart.
Consideration of merits:	The amendment is not founded on documented nuisance complaints or compliance matters, but instead on broader strategic planning considerations relating to housing availability, housing affordability and the primary function of residential zones in accommodating residents. While amenity impacts may not always be readily quantifiable, planning decisions commonly rely on both quantitative and qualitative evidence when addressing long-term land use issues. The representation notes that existing lawful visitor accommodation will retain use rights, and suggests these properties will not necessarily return to the long-term rental market. The representor is correct that existing lawful visitor accommodation uses will continue to be permitted. However, the amendment is prospective in nature and is intended to reduce the future conversion of current residential housing stock to visitor accommodation use. It is not dependent upon existing operators returning properties to the long-term rental market but instead seeks to influence future housing outcomes within a constrained housing market.

The representor's personal circumstances and intentions regarding use of their property are acknowledged. However, planning controls must be based on broader strategic land use outcomes rather than the circumstances of individual property owners. The fact that some properties would not become long-term rentals does not negate the broader objective of retaining housing opportunities for future residents.

The issues raised regarding rental bond data are noted. However, rental bond data is only a supply-side indicator and, by itself, is not a reliable indicator of the health of the rental market or the adequacy of housing availability. Even if the number of rental bonds has increased over time, that does not indicate whether supply has kept pace with demand, nor does it demonstrate that rental market conditions have improved.

A more relevant indicator is the vacancy rate, which reflects the relationship between rental supply and demand. Available vacancy rate data from multiple sources indicates that Hobart's vacancy rate has contracted significantly since 2016, demonstrating sustained pressure in the rental market. In this context, the draft amendment should not be assessed solely by reference to whether the total number of rental bonds has increased over a ten-year period. The relevant planning issue is whether the continued conversion of residential dwellings to whole dwelling visitor accommodation would further reduce the pool of housing available for permanent residential occupation in an already constrained rental market.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 47

Representor: Denise and Graeme Folkard

Date received: 23/07/2026

Matters raised: Supports the draft amendment and considers that un-hosted whole dwelling short stay accommodation should not operate in residential areas. Argues that houses should prioritise permanent residents, that Airbnb and similar platforms remove homes from the housing market, and that commercial accommodation should be directed to appropriate commercial accommodation settings.

Consideration of merits: Support for draft amendment is noted.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 48

Representor: Keiran Craig-Jones (obo Short Term Accommodation Association Australia (STAAA))

Date received: 24/07/2026

Matters raised:

The representation opposes the amendment on both procedural and substantive grounds. It submits that, despite requesting to be registered as a stakeholder and receiving assurances from Council officers that it would be notified when consultation commenced, it was not advised when the exhibition period opened and only became aware of the amendment after public exhibition had commenced.

The representation argues that the amendment lacks a sufficient evidentiary basis, particularly in relation to residential amenity impacts, noting that the supporting reports do not rely on complaints data, compliance records or other empirical evidence of amenity harm. It contends that the material supporting the amendment is focused primarily on housing affordability and housing supply rather than amenity considerations, and argues that existing lawful whole dwelling visitor accommodation would retain use rights, meaning no existing properties would return to the long-term rental market as a result of the amendment.

The representation questions the conclusions drawn from housing and rental data, raises concerns regarding the independence and methodology of research undertaken by Professor Peter Phibbs, and refers to previous Council statements that short stay accommodation is a statewide issue more appropriately addressed through broader planning reform.

The representation also submits tourism and visitor economy evidence, including accommodation demand, visitor expenditure and economic contribution data, to argue that short-term accommodation plays an important role in supporting Hobart's tourism sector and future visitor demand.

Consideration of merits:

The representation raises both procedural and substantive concerns regarding the proposed amendment.

In relation to consultation, the statutory exhibition requirements prescribed by the *Land Use Planning and Approvals Act 1993* (Tas) were undertaken. The matters raised regarding stakeholder notification processes are acknowledged and have been noted. They do not affect the validity of the exhibition process, and Council's extension of the representation period provided additional opportunity for this representor and its members to participate in consultation.

The representation places particular emphasis on the absence of complaints and compliance data as evidence of residential amenity impacts. However, the amendment is not founded solely on documented nuisance complaints. The planning framework recognises that residential amenity encompasses a broad range of considerations, including neighbourhood character, community cohesion, housing function and the ongoing availability of residential land for residential purposes. The amendment seeks to address the cumulative effects of the ongoing conversion of housing stock to visitor accommodation within residential areas, rather than responding to individual enforcement matters.

The supporting material identifies a relationship between whole dwelling visitor accommodation and housing availability, affordability and

neighbourhood change. While some amenity impacts are difficult to quantify, this does not mean they are irrelevant to planning decision-making. Planning authorities routinely consider both quantitative and qualitative evidence when assessing strategic land use issues.

The representation also argues that the amendment will not return existing visitor accommodation properties to the long-term rental market because existing lawful uses will continue. This is acknowledged. The amendment is prospective in nature and is intended to influence future land use outcomes rather than alter existing lawful visitor accommodation uses. The purpose of the amendment is to reduce the ongoing loss of residential housing stock to visitor accommodation over time and support the retention of housing opportunities for future residents. The representation refers to a recent article in *The Conversation*³ that states without properly considering owner motivations and property characteristics, “tighter regulation could result in vacant properties rather than more long-term rental supply”, however this statement in that article was referring to regulation that was retrospective rather than as the draft amendment is prospective, and which was directing existing short stay properties to convert to long-term rentals.

With respect to housing supply data, the amendment is supported by a broader range of evidence than rental bond figures alone. The supporting reports consider housing market conditions, rental affordability, vacancy rates, patterns of visitor accommodation growth and the cumulative impacts of residential dwellings being used for visitor accommodation. The existence of increases in rental bonds does not, of itself, demonstrate that short stay accommodation has no effect on housing availability.

The concerns regarding the independence of research relied upon are noted. The supporting reports were prepared by appropriately qualified practitioners and have been publicly exhibited as part of the amendment process. The amendment should be assessed on the merits of the evidence presented rather than on assertions regarding funding relationships disclosed elsewhere. It is common practice for experts in planning matters to be paid for their services including in planning appeal matters and broadly accepted that payment for services does not compromise the independence of advice.

The representation also refers to Council's previous position regarding statewide reform. While housing affordability and visitor accommodation are issues experienced across Tasmania, the amendment has been developed in response to demonstrated local housing pressures and local circumstances within Hobart. The existence of broader statewide issues does not prevent Council from pursuing planning responses considered appropriate to local conditions.

Finally, the economic contribution of visitor accommodation and ongoing tourism demand are acknowledged. The amendment does not prohibit visitor accommodation throughout Hobart, nor does it apply to existing lawful operations or visitor accommodation opportunities available within other parts of the planning scheme. The amendment seeks to strike an appropriate balance between supporting the visitor economy and maintaining adequate housing opportunities within residential areas.

For these reasons, it is considered that the matters raised do not warrant modification or abandonment of the amendment.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

³ Buckle C, Gurran N and Phibbs P (2026). Can tighter rules on short stay rentals help the long term market. Published July 3. Available from <https://theconversation.com/cantighter-rules-on-short-stay-rentals-help-the-long-term-market-286240>

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.
---	--

Representation no. 49

Representor:	Ann Fair (member of STAAA)
Date received:	24/07/2026
Matters raised:	The representor opposes the amendment, arguing that there is no demonstrated evidence of harm to residential amenity and that the proposal will not achieve its housing objectives because existing lawful visitor accommodation will continue to operate. The representation states that the property would not enter the long-term rental market regardless of the amendment due to previous negative experiences with long-term tenants and personal use of the property. It also refers to rental bond data, ongoing visitor accommodation demand, Council's previous position favouring statewide reform, and concerns about the research relied upon to support the amendment.
Consideration of merits:	The concerns raised mirror a number of issues raised in other representations. The amendment does not seek to remove existing lawful visitor accommodation rights and therefore does not rely on an assumption that existing operators will properties to the rental market. Rather, it is strategic in intent and seeks to influence future land use outcomes by reducing the further conversion of current housing stock to visitor accommodation in residential areas. The personal circumstances of individual property owners are acknowledged. However, planning controls must be developed having regard to broader strategic planning outcomes rather than the intentions or experiences of individual landowners. While some owners may not choose to enter the long-term rental market, the amendment is directed to the cumulative impact of future housing stock transitioning away from residential use. The contribution of visitor accommodation to tourism and visitor choice is recognised. The amendment nevertheless seeks to balance visitor accommodation opportunities with the need to maintain housing availability for residents within residential zones. The remainder of the issues raised regarding amenity evidence, rental bond data, prior Council positions and research independence have been considered elsewhere in this report. These matters do not alter the conclusion that the amendment is strategically justified and appropriate. Accordingly, no modification to the amendment is recommended in response to this representation.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

recommendation (section 40K(2)(c)(ii) of the LUPA Act)

Representation no. 50

Representor: Sally Duke

Date received: 24/07/2026

Matters raised:

The representor opposes the amendment on the basis that there is no evidence of residential amenity impacts and that the proposal will not improve housing availability because existing lawful visitor accommodation will remain unaffected.

The representation states that the property would not be used for long term rental accommodation regardless of the amendment, refers to rental bond data and tourism demand data, and argues that Council has previously identified the issue as one requiring statewide consideration. Concerns are also raised regarding the independence of research relied upon in support of the amendment

Consideration of merits:

The issues raised are substantially the same as those raised in several other representations.

The amendment is intended to address future housing availability by limiting the further conversion of existing dwelling stock to visitor accommodation in residential areas. It is not reliant upon existing operators returning properties to the long-term rental market and does not alter existing lawful use rights.

The representor's personal circumstances and intentions regarding the future use of their property are noted. However, planning policy must be based on broader strategic outcomes and cannot be determined by the intentions of individual owners.

The available evidence supporting the amendment extends beyond any single dataset and includes consideration of housing affordability, rental pressures, housing supply constraints and patterns of visitor accommodation growth within Hobart. While differing interpretations of the data exist, the supporting material concludes that intervention is warranted to assist in protecting housing opportunities for residents.

The broader matters relating to amenity impacts, tourism demand, statewide reform and concerns regarding supporting research have been considered elsewhere in this report. These matters do not justify amendment or abandonment of the proposal.

Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)

No modification is recommended in response to this representation.

Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)

There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

Representation no. 51

Representor: Dannielle Campbell (obo Wolf Short Stay)

Date received:	25/07/2026
Matters raised:	The representor opposes the amendment, arguing that there is insufficient evidence of residential amenity impacts and that the proposal is unlikely to improve housing supply outcomes. The representation submits that many visitor accommodation properties would not transition to long term rentals, questions the housing supply conclusions drawn from the available evidence, and highlights the role of short stay accommodation in meeting visitor demand and supporting the tourism economy. It also notes Council's previous position that the matter should be addressed through statewide reform and calls for greater reliance on transparent and independent evidence.
Consideration of merits:	The representation acknowledges the importance of addressing housing affordability but questions the effectiveness of the proposed planning response. The amendment recognises the ongoing contribution that visitor accommodation makes to Hobart's visitor economy and does not seek to remove existing visitor accommodation operations. Rather, it seeks to establish an improved balance between visitor accommodation growth and the protection of housing opportunities within residential areas. The planning rationale for the amendment extends beyond demonstrated nuisance complaints or compliance matters. Strategic planning decisions commonly address cumulative and long-term land use impacts, including the gradual transition of residential housing stock to other purposes. The protection of housing supply and residential function is a legitimate planning objective. The amendment is prospective in nature and seeks to reduce future housing loss rather than reverse historic changes. While not all properties used for visitor accommodation would necessarily become long term rentals, the amendment seeks to influence the future allocation of the limited residential housing stock within Hobart. The contribution of visitor accommodation to tourism, employment and local business activity is acknowledged. However, the amendment does not prohibit visitor accommodation across Hobart, nor does it remove existing lawful visitor accommodation opportunities. Instead, it seeks to ensure that residential zones continue to perform their primary function of accommodating residents. The concerns regarding research independence, rental bond data and Council's previous position on statewide reform are noted and have been addressed elsewhere in this report. These matters do not outweigh the strategic planning justification supporting the amendment. Accordingly, it is considered that the issues raised do not warrant modification of the amendment.
Recommendation in relation to representation (section 40K(2)(c)(i) of the LUPA Act)	No modification is recommended in response to this representation.
Effect on the draft amendment, and the LPS to which it relates, as a whole, of implementing the recommendation (section 40K(2)(c)(ii) of the LUPA Act)	There is no effect on implementing the recommendation on the draft amendment or the LPS as a whole because no modification is recommended.

