

7 July 2026

Mr Michael Stretton
Chief Executive Officer
City of Hobart

Via Email: representation@hobartcity.com.au

Dear Michael

RE: HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan (the Plan)

The Owners Corporation Network of Australia Ltd (OCN) appreciates the opportunity to comment on the Plan and highlight its interaction with strata schemes in Hobart.

About OCN: OCN is the peak advocacy group for the interests of owners in strata (aka, body corporate, or owners' corporation) schemes nationwide. We represent member interests to all levels of government, as well as work with trusted partners to provide high-quality information and education resource to owners. OCN is a not-for-profit group governed by a board of directors supported by a dedicated operational team. OCN has now established a formal Tasmanian subcommittee, to further the interests of Tasmanian strata owners. The subcommittee is led by Ms Di Elliffe, owner in and committee member of a Hobart strata scheme. As Queensland's former Commissioner for Body Corporate and Community Management, I work directly with our interstate subcommittees to support their engagement in all jurisdictions.

Data from the University of New South Wales' [2022 Australasian Strata Insights Report](#) indicates that more than 1 in 10 Australians live in strata, with estimates suggesting there are over 350,000 strata schemes and more than 3 million individual lots (units) in Australia. The Report notes that in Tasmania, there are over 18,000 strata lots, with 7% of Tasmanians living in strata. These numbers are likely to increase as housing affordability and availability means that strata will be the only viable option for many homeowners and tenants. Strata comprises high-rises, villas, townhouses, duplexes, gated communities, and holiday letting. Larger strata schemes might comprise of hundreds of individual lots and involve multi-million-dollar budgets, as well as the requirement for volunteer committees to make crucial decisions that will have significant impact on the shared investment each owner makes in the scheme.

While strata legislation is different in each Australian jurisdiction, it does have commonalities, including provisions for group decision-making and the responsibility to maintain common property. Legislative technicality and complexity is also a common feature, presenting unique public policy challenges which incorporate elements of housing, community services and law and justice policy.

Short stay accommodation, and strata: there are significant implications for strata from the regulation (or not) of short stay accommodation. Short stay visitors do not have the same investment in the amenity or facilities of a strata scheme that its longer-term residents and owners do. This can lead to concerns about noise, nuisance, security, parking and wear and tear on common property. Because short stay visitors are not onsite for a lengthy period, it is impossible for a strata scheme to take meaningful action when issues occur. Other jurisdictions, recognising these challenges, have moved to regulate short stay accommodation to better protect the interests of strata owners. OCN recently consulted with Brisbane City Council on a short stay accommodation regulatory proposal.

The Proposed Reforms: OCN, via its OCN Tasmania subcommittee, supports the introduction of the Plan into the Local Provisions Schedule in the planning scheme for Greater Hobart. OCN understands that the purpose of the draft amendment is to limit the impact of short stay accommodation use on the availability and affordability of housing for long-term residents in the city and to maintain the character of local residential communities. That said, the proposed amendment does raise broader strata issues. The *Strata Titles Act 1996* (the Act) provides as follows in s91(2): “A by-law may impose a minimum term (not exceeding 6 months) for the letting of lots.” Despite this, there is nothing currently in the Act’s Model By-Laws, which apply by default to all strata schemes which have not created their own individual by-laws.

As noted above, short stay accommodation can have a negative impact on the residential amenity of people living in strata. The loss of amenity results from neighbours being replaced by strangers. This not only reduces the sense of community in a residential neighbourhood but also introduces some sharp externalities particularly relating to

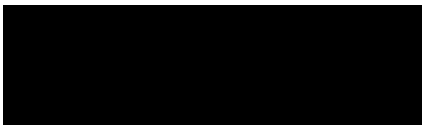
- inability to develop community norms around behaviours, disposal of waste, use of shared facilities;
- reduced understanding and lack of respect for neighbours;
- increased levels of noise associated from people using their holiday opportunity to host parties in the short term rental dwelling; and
- loss of a sense of community, enjoyment of friendships with neighbours, confidence of support from neighbours in case of accident, emergency, or security issue.

These factors then in turn can have a detrimental impact on Hobart’s tourism reputation.

OCN and OCN Tasmania therefore call upon the Tasmanian Government to introduce reforms that a minimum term for residential lets in strata of six months should be included in the Model By-Laws so that this policy becomes the default for all strata schemes. OCN and OCN Tasmania call upon the City of Hobart’s support for this measure.

OCN and OCN Tasmania would welcome an opportunity to meet with you to discuss this issue, strata issues more generally and the objectives OCN is aiming to achieve in supporting the interests of Tasmanian strata owners. OCN works collaboratively with private and public sector partners on a range of information, education and consultative endeavours. It would be beneficial to explore what collaborative endeavours might be possible in Hobart. The best point of contact is Ms Di Elliffe, OCN Tasmania Subcommittee, at [REDACTED]

Thank you again for the invitation to comment.



**Managing Director – Development, and
Board Director
Owners Corporation Network of Australia Limited**