

From: [REDACTED]
To: [Representation](#)
Subject: Representation Opposing Draft Amendment PSA-25-3: HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan
Date: Saturday, 25 July 2026 11:47:03 AM

Dear Chief Executive Officer,

I write on behalf of Wolf Short Stay to formally oppose Draft Amendment PSA-25-3: HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan.

As a Tasmanian-owned boutique short stay management company, Wolf Short Stay works closely with property owners, guests, local businesses and service providers across Southern Tasmania. Through our day-to-day operations, we see firsthand the contribution professionally managed short stay accommodation makes to the visitor economy, local employment and the ongoing investment in Tasmania's tourism offering.

While we acknowledge the importance of addressing housing affordability and protecting residential amenity, we do not believe the proposed amendment is supported by sufficient evidence or that it will achieve its stated objectives.

Our concerns are outlined below.

1. There is no evidence of measurable harm to residential amenity.

The stated purpose of the amendment is to protect residential amenity. However, Council's own consultants, SGS Economics and Planning, acknowledge that impacts such as noise and neighbourhood cohesion have not been quantified due to limitations in the available evidence and have instead been considered qualitatively. We have not identified any empirical complaints data or compliance evidence demonstrating that professionally operated whole dwelling short stay accommodation is creating widespread residential amenity issues.

2. The amendment will not achieve its stated housing objective.

Council has confirmed that existing lawful whole dwelling visitor accommodation will retain its existing use rights. As a result, no existing properties will return to the long term rental market because of this amendment. The proposal instead seeks to prevent hypothetical future conversions without demonstrating that doing so will meaningfully improve housing availability.

3. The evidence does not support the assumption that restricting new visitor accommodation will increase long term housing supply.

Our experience working with property owners indicates that many choose short stay accommodation because it offers flexibility for personal use, supports unique or premium accommodation that is not suited to the long term rental market, or forms part of a long term investment strategy. Restricting future approvals will not necessarily convert these properties into permanent rentals. In many cases, they simply will not enter the long term housing market.

4. The available data does not support the housing loss narrative.

Tasmanian rental bond data demonstrates that active rental bonds within the Hobart local government area have increased over the past decade. While housing affordability is a genuine issue requiring action, the available evidence does not demonstrate that short stay accommodation is a significant contributor these challenges.

5. Visitor demand continues to exceed available commercial accommodation.

Tourism Tasmania's reporting shows continued strong demand for short stay accommodation while occupancy across parts of the commercial accommodation sector has softened. Professionally managed visitor accommodation complements hotels and serviced apartments by providing accommodation types that many visitors actively seek, particularly families, larger groups, extended stay guests and visitors seeking self-contained accommodation.

6. Council has previously acknowledged this is a statewide policy issue.

In its submission to the Tasmanian Planning Commission dated 4 March 2024, Hobart City Council concluded that this issue was not unique to Hobart and was more appropriately addressed through statewide reform rather than individual municipal planning controls. The current documentation does not clearly explain what evidence has emerged to justify a departure from that position.

7. Decisions of this significance should be founded on transparent and independent evidence.

Given the far-reaching implications of this amendment for property owners, tourism operators, local businesses and future investment, it is essential that Council's decision-making process is supported by robust, transparent and demonstrably independent evidence.

Wolf Short Stay supports evidence-based regulation that balances housing outcomes with sustainable tourism, protects residential amenity and provides certainty for responsible operators. We believe these objectives can be achieved without introducing planning controls that are unlikely to deliver their intended outcomes while risking unintended consequences for Tasmania's visitor economy, investment confidence and the many local businesses that rely upon it.

For these reasons, we respectfully request that Council not proceed with certification of Draft Amendment PSA-25-3 in its current form. Alternatively, we request that Council commission a comprehensive, independent evidence base, including complaints data, compliance data and measurable residential amenity impacts, before progressing any further.

Thank you for considering our representation.

Yours sincerely

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