

From: [REDACTED]
To: [Representation](#)
Subject: Draft Amendment PSA-25-3: HOB-S11.0
Date: Friday, 24 July 2026 5:14:26 PM

Dear CEO,

I wish to make a representation opposing Draft Amendment PSA-25-3: HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan for the following reasons:

1. **There is no evidence of harm to residential amenity.** Council's own supporting documents acknowledge that concerns regarding residential amenity have not been supported by measurable evidence such as complaints or compliance data.
2. **The amendment will not achieve its stated housing objective.** Existing lawful whole dwelling short stay accommodation will retain its use rights, meaning no existing properties will return to the long term rental market as a result of this proposal.
3. **This amendment would not place my property into the long term rental market.** Regardless of whether this amendment proceeds, my property would not become a long term rental because **[insert your own reason, for example: I purchased it specifically as a short stay investment / I use it myself during the year / the financial model does not work as a long term rental]**.
4. **The available data does not support the claim that short stay accommodation has significantly reduced long term rental supply.** Tasmanian rental bond data indicates that active rental bonds within the Hobart municipality have increased over the past decade.
5. **Visitor demand continues to grow.** Tourism data demonstrates ongoing demand for short stay accommodation while occupancy within the commercial accommodation sector has declined, suggesting existing accommodation providers are unlikely to absorb this demand.
6. **Council has previously acknowledged this is a statewide issue.** In previous submissions to the Tasmanian Planning Commission, Council indicated that any changes to short stay accommodation should be considered through statewide reform rather than individual council planning schemes.
7. **The research relied upon raises concerns regarding independence.** Research frequently referenced in support of the amendment has been undertaken by an academic who has publicly disclosed receiving funding from Hobart City Council for short stay accommodation research. This relationship was not disclosed within the supporting report.

For these reasons, I respectfully request that Council not proceed with certification of Draft Amendment PSA-25-3 in its current form, or alternatively commission an independent evidence base, including complaints and compliance data, before progressing any further.

Yours sincerely,

Sally Duke