

From: [REDACTED]
To: [Representation](#)
Subject: Opposition to Draft Amendment PSA-25-3: HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan
Date: Friday, 24 July 2026 12:44:53 PM

Dear HCC CEO

My name is Ann Fair and I am a member of the Short Term Accommodation Association Australia (STAAA). From my understanding, Jennifer Lawley, Manager Strategic Land Use Planning at Hobart City Council, sent an email to STAAA on the 2 July agreeing to an extension for representation by STAAA members until Friday 24 July.

In the circumstances, I wish to make a representation to oppose the Draft Amendment PSA-25-3: HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan on the following basis:

1. No evidence of harm to residential amenity. The stated purpose of the amendment is to protect residential amenity, yet Council's own consultants (SGS Economics and Planning) concede that amenity impacts such as noise and reduced neighbourhood cohesion "are acknowledged in the analysis but are not monetized due to limitations in the available evidence" and are "instead considered qualitatively." No complaints data, compliance data or other empirical record of amenity harm has been identified anywhere in the supporting documentation.
2. The amendment will not achieve its own housing objective. Council has confirmed that existing lawful whole-dwelling short-stay operators retain their use rights and are unaffected. This means no properties will return to the long-term rental market as a result of this amendment. The entire housing affordability rationale rests on preventing future conversions that have not yet occurred.
3. This amendment will not add my property, or properties like mine, to the long-term rental pool. I would never place my property into the long-term rental market, regardless of whether this amendment proceeds, because I have had long-term tenants before and been abused and cheated by them. On numerous occasions, I have needed to patch holes in the plaster (and even the doors), repaint and recarpet to bring the property back to satisfactory condition, a cost that a bond is completely insufficient to cover. I have also had tenants leave still owing \$3000 in unpaid rent and without any way to recoup this. I also use the property myself for part of the year. Restricting new whole dwelling short-stay accommodation will not convert properties like mine into long-term rentals, it will simply remove them as a housing option altogether, whether for visitors or anyone else.
4. The underlying data does not support the housing loss narrative. Tasmanian rental bond data shows that active rental bonds in the Hobart local government area have increased, not decreased, between 2016 and 2026, which is inconsistent with the claim that short-stay accommodation has materially reduced the long-term rental pool.
5. Visitor demand data contradicts the case for restriction. Tourism Tasmania's own reporting shows short-stay accommodation demand in the Southern region at record levels, while commercial accommodation occupancy is falling. There is no evidence that hotels or other commercial accommodation could absorb the demand currently met by short-stay accommodation. I have also had many short-term stay guests thank me for the ability to

stay at my large house (6bed/3 bath) as their extended family would not have been able to afford to all come (to a wedding or other big family get-together) had they had to pay for hotel accommodation. Fewer opportunities like my house would clearly mean fewer guests to the state.

6. Council has previously taken the opposite position. In its own report to the Tasmanian Planning Commission dated 4 March 2024, Council found this exact proposal was "not an issue unique to the Hobart LGA" and should be resolved through statewide reform, not a local planning amendment. Nothing in the current documentation explains what has changed since then.

7. Undisclosed conflict of interest in the research relied upon. Professor Peter Phibbs, whose research underpins much of the case for this amendment, has publicly disclosed that he has received funding from Hobart City Council itself for short-term rental accommodation research. This relationship was not disclosed in the Era Advisory report, and Council has not explained how it has satisfied itself that the research is independent of that funding arrangement.

For these reasons, I ask that Council not proceed with certification of draft amendment PSA-25-3 in its current form, or, in the alternative, commission a genuine independent amenity specific evidence base, including complaints and compliance data, before any further steps are taken.

I would welcome the opportunity to be kept informed of Council's consideration of this matter.

Yours sincerely,
Ann Fair