

**From:** [REDACTED]  
**To:** [Representation](#)  
**Subject:** [CAUTION: SUSPECT SENDER] ASTRA Submission – Draft Amendment PSA-25-3  
**Date:** Wednesday, 15 July 2026 4:12:28 PM  
**Attachments:** [ASTRA Submission\\_Hobart LPS Amendment\\_PSA-25-3\\_July 2026.pdf](#)

---

Dear Chief Executive Officer,

On behalf of the Australia and New Zealand Short-Term Rental Association (ASTRA), please find attached our submission regarding **Draft Amendment PSA-25-3 – HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan**.

ASTRA appreciates the opportunity to provide feedback on the proposed amendment.

As outlined in our submission, ASTRA supports clear, lawful and workable planning pathways for visitor accommodation. We also recognise the seriousness of housing affordability and availability pressures in Hobart and across Tasmania.

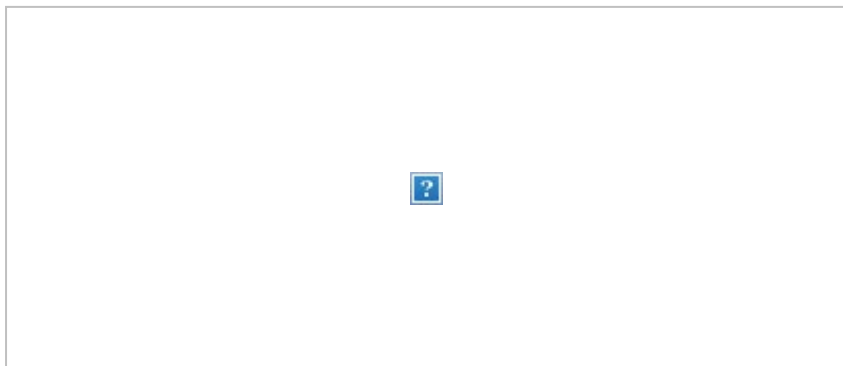
However, ASTRA is concerned that the proposed amendment risks adding another layer of local restriction to Tasmania's existing statewide visitor accommodation framework, without clearly demonstrating that it will produce a meaningful housing benefit.

We would welcome the opportunity to engage further with the City of Hobart, Council officers and relevant stakeholders to support a balanced, evidence-based and proportionate approach.

Thank you again for the opportunity to provide this representation.

Yours sincerely,  
Yoav Tourel  
Board Chair  
Australia and New Zealand Short-Term Rental Association

[REDACTED]





**astra**

Australia and New Zealand  
Short-Term Rental Association

## **ASTRA Submission to Hobart City Council - Draft Local Provisions Schedule Amendment PSA-25-3 HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan**

To: Chief Executive Officer  
City of Hobart  
By email: [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

Dear Chief Executive Officer,

On behalf of the Australia and New Zealand Short-Term Rental Association (ASTRA), thank you for the opportunity to provide a representation on Draft Amendment PSA-25-3, which proposes to include HOB-S11.0 Hobart Visitor Accommodation Specific Area Plan in the Tasmanian Planning Scheme-Hobart Local Provisions Schedule.

ASTRA is the peak industry association representing short-term rental accommodation across Australia and New Zealand. ASTRA represents participants across the short-term rental accommodation sector, including hosts, property owners, professional property managers, local operators, booking platforms, suppliers, technology providers and the broader network of small businesses that support short-term accommodation.

ASTRA supports clear, lawful and workable planning pathways for visitor accommodation. We recognise the seriousness of housing affordability and availability pressures in Hobart and across Tasmania. However, ASTRA is concerned that the proposed amendment risks creating a broad local restriction on whole-dwelling visitor accommodation without sufficient evidence that such a measure will materially improve long-term housing outcomes.

ASTRA respectfully submits that the proposed amendment should not proceed in its current form.

### **1. Summary of ASTRA's position**

ASTRA's position is not that visitor accommodation should be unregulated.

Rather, ASTRA supports a statewide, evidence-based and proportionate framework that balances housing, visitor economy, property rights, neighbourhood amenity, compliance and community needs.

ASTRA is concerned that the proposed Specific Area Plan would:

- add another layer of local restriction to an already regulated statewide planning framework;
- treat visitor accommodation primarily as a housing supply problem, without adequately recognising its broader accommodation, tourism, workforce, medical, emergency, relocation and family uses;
- risk restricting lawful and flexible use of residential dwellings without demonstrating a clear and proportionate housing benefit;
- create uncertainty for property owners, hosts, local operators and accommodation users;
- compound the impact of other recent City of Hobart measures, including increased application fees, differential rating, compliance activity and broader housing-policy settings;
- and further fragment Tasmania's statewide framework through council-by-council controls.

ASTRA encourages the City to adopt a more balanced approach focused on evidence, targeted compliance, better data, amenity management and statewide consistency, rather than broad local restrictions on whole-dwelling visitor accommodation.

## **2. Tasmania already has a statewide framework for visitor accommodation**

Tasmania has an established statewide framework for short-stay and visitor accommodation.

This includes planning settings that identify when visitor accommodation requires approval and when exemptions apply, as well as statewide short-stay accommodation reporting obligations.

ASTRA supports maintaining and improving that statewide framework rather than adding further local layers that vary by council area.

A consistent statewide approach is important for:

- property owners;
- guests;
- local operators;
- planning professionals;
- booking platforms;
- investors;
- tourism businesses;
- regulators;
- and councils.

Fragmentation creates uncertainty and complexity. It also risks producing inconsistent outcomes between municipalities, even where the same type of accommodation use is being considered under the same statewide planning system.

ASTRA submits that any further regulation of visitor accommodation should be pursued through statewide reform, improved data-sharing and proportionate compliance settings, rather than through individual councils progressively introducing local prohibitions or near-prohibitions.

### **3. The amendment should be assessed against evidence, not housing assumptions**

ASTRA recognises the City's concern about housing availability and affordability.

However, housing affordability is complex. It is affected by many factors, including new dwelling supply, planning capacity, population growth, household formation, interest rates, construction costs, investor confidence, taxation settings, social housing investment and broader economic conditions.

Short-term rental accommodation should not be treated as a simple or primary cause of housing pressure without clear evidence.

ASTRA is concerned that the proposed amendment appears to assume that restricting new whole-dwelling visitor accommodation in residential zones will materially improve long-term housing supply. That assumption requires careful testing.

This is particularly important because not all whole-dwelling visitor accommodation represents investor-owned housing stock that would otherwise be available for permanent rental. Some properties are owner-used, intermittently available, used to support household income, or managed on behalf of individual owners rather than held as dedicated commercial accommodation assets.

Platform data shared by Airbnb indicates that, as of June 2026, more than 80% of Hobart hosts on Airbnb share just one home for short-stay accommodation. Airbnb's submission also states that more than half of Hobart hosts surveyed said the income they earn from Airbnb helps them stay in their own home, while two-thirds of hosts are women and almost one-third are over the age of 60.

This reinforces the need for Council to carefully understand who will be affected by the amendment and whether the assumed housing benefit is realistic.

Key questions include:

- How many whole-dwelling visitor accommodation properties within the proposed Specific Area Plan area would realistically return to the long-term rental market if the amendment proceeds?
- How many are owner-used homes, second homes, inherited properties, family homes, intermittently available properties or properties unsuitable for permanent rental?
- How many operate only part of the year?
- How many are used for non-leisure stays such as medical, family care, workforce, relocation, emergency or insurance accommodation?
- What evidence demonstrates that the proposed restriction will produce a measurable improvement in long-term rental availability or affordability?

- What are the expected impacts on tourism capacity, event accommodation, business travel and Hobart's visitor economy?
- Has the cumulative impact of planning restrictions, differential rates, increased application fees and a possible state short-stay levy been assessed together?

ASTRA submits that a measure of this significance should only proceed if the evidence demonstrates a clear, material and proportionate housing benefit.

## **4. Visitor accommodation serves broader community and economic needs**

Visitor accommodation is often characterised as holiday accommodation. That is only one part of the picture.

Short-term and visitor accommodation also supports:

- business travel;
- conference and event visitors;
- medical and hospital-related stays;
- family care and family visitation;
- emergency and insurance accommodation;
- relocation and transition periods;
- temporary workforce needs;
- education-related stays;
- people attending major cultural, sporting and community events;
- and families needing home-style accommodation with kitchens, laundry facilities and flexible space.

These needs are particularly important in a city such as Hobart, where visitor accommodation supports tourism, events, hospitality, small business, cultural activity and the wider regional economy.

Short-stay accommodation is not always a direct substitute for hotel accommodation. It often meets different needs, including space, location, length of stay, kitchen and laundry facilities, family requirements or proximity to hospitals, workplaces and support networks.

Airbnb's submission indicates that almost one-third of Greater Hobart Airbnb guests surveyed said their trip could not have been accommodated by a hotel. This highlights the role short-stay accommodation can play in meeting demand that may not be adequately served by traditional accommodation alone.

The proposed amendment should therefore be assessed not only through a housing lens, but also through the lens of Hobart's broader accommodation ecosystem.

## 5. Homes are used flexibly over time

A residential dwelling is not fixed in one form of occupation for the whole of its life.

Homes move between different uses in response to ordinary family, employment, financial and life circumstances. Owners may need flexibility because of:

- temporary absence;
- work relocation;
- family care;
- separation or bereavement;
- retirement planning;
- mortgage and cost-of-living pressures;
- periods living interstate or overseas;
- inherited or family properties;
- renovation or transition periods;
- or the need to make use of a home that would otherwise sit vacant for part of the year.

Visitor accommodation can form part of that flexible use.

ASTRA is concerned that the proposed amendment may reduce flexibility for ordinary homeowners while producing limited or uncertain housing benefits.

## 6. Existing lawful operators and transition arrangements require clarity

ASTRA asks the City to provide clear guidance on how the proposed amendment would affect:

- existing lawful visitor accommodation approvals;
- existing use rights;
- current applications;
- pre-application discussions already underway;
- properties that have incurred professional planning or legal costs before the amendment;
- properties operating lawfully under current permits or exemptions;
- and properties that may move between private use and visitor accommodation over time.

Existing lawful operators should not be left in uncertainty.

The City should also clearly explain whether any transitional arrangements will apply and how owners will be treated if they have acted in good faith under the current framework.

## 7. Cumulative regulatory impact must be considered

The proposed amendment should not be viewed in isolation.

Visitor accommodation in Hobart is already subject to multiple layers of regulation and cost, including:

- planning approval requirements where applicable;
- visitor accommodation application fees;
- differential rates;
- compliance monitoring;
- state planning settings;
- booking platform reporting requirements;
- and potential future state-level policy changes, including a proposed short-stay levy.

ASTRA is concerned that the cumulative impact of these measures may make lawful visitor accommodation pathways increasingly difficult, expensive and uncertain.

This cumulative burden is not theoretical. Hobart operators and hosts are already navigating differential rates, compliance obligations, state reporting requirements and increased costs associated with visitor accommodation approvals. Airbnb's submission also notes that Hobart hosts already pay double rates and may face a \$5,000 fee for new discretionary applications.

These measures should be assessed together before any further local restriction is introduced.

If the objective is to manage amenity, compliance or data concerns, those matters should be addressed directly through targeted compliance, clear management standards and improved data, rather than through a broad planning restriction.

## 8. Amenity issues should be managed through targeted tools

ASTRA supports reasonable measures to manage neighbourhood amenity.

Where there are concerns about noise, waste, parking, guest conduct or property management, targeted tools are available and should be preferred over broad restrictions.

These may include:

- visitor management plans;
- clear local contact requirements;
- guest behaviour standards;
- complaint response processes;
- compliance action against non-compliant operators;
- conditions on approvals where justified;

- and better data-sharing between state and local government.

These targeted tools are more proportionate than restricting an entire class of accommodation use across broad residential areas.

## **9. The amendment risks undermining Hobart's visitor economy**

Hobart relies on a diverse accommodation mix.

Hotels, serviced apartments, hosted accommodation, whole-home visitor accommodation and other short-stay models all play different roles.

This diversity is especially important during major events and peak-demand periods. Hobart and Tasmania rely on accommodation capacity to support events, conferences, festivals and cultural activity, including events such as Dark Mofo, MONA FOMA and Taste of Tasmania.

Future demand associated with major projects and events, including Macquarie Point Stadium, may place further pressure on accommodation supply. Hotels provide an essential part of this capacity, but they are fixed in number and cannot always absorb peak or location-specific demand.

Whole-home accommodation is especially important for:

- families;
- groups;
- longer temporary stays;
- people travelling with children;
- people needing kitchens and laundry facilities;
- visitors seeking neighbourhood-based stays;
- people travelling for family, care or medical reasons;
- and event or conference visitors during peak-demand periods.

Restricting new whole-dwelling visitor accommodation in residential zones may reduce accommodation diversity and increase pressure on other accommodation types, particularly during peak periods.

This could affect not only visitors, but local hospitality, retail, cleaning, maintenance, trades, property services and tourism businesses.

## **10. ASTRA's recommendations**

ASTRA respectfully recommends that the City:

1. Not proceed with Draft Amendment PSA-25-3 in its current form.

2. Undertake further targeted consultation with affected homeowners, property managers, tourism operators, planning professionals, business groups, event-sector representatives and visitor-economy stakeholders.
3. Publish clear evidence demonstrating the expected housing benefit of the proposed amendment, including how many properties are likely to return to the long-term rental market.
4. Publish a clear assessment of the host and owner profile likely to be affected by the amendment, including the proportion of properties that are owner-used, intermittently available, used to support household income, or otherwise unlikely to enter the long-term rental market.
5. Assess the cumulative impact of the proposed amendment alongside application fees, differential rates, compliance activity and any state-level short-stay levy.
6. Provide clear guidance on existing lawful operators, existing approvals, current applications, pre-application processes and transitional arrangements.
7. Consider targeted amenity and compliance tools as an alternative to broad land-use restriction.
8. Work with the Tasmanian Government, ASTRA and other stakeholders to improve statewide data, compliance and policy consistency.
9. Recognise the broader role of visitor accommodation in supporting tourism, events, workforce, medical, family, emergency, relocation and non-leisure accommodation needs.

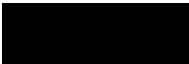
## 11. Conclusion

ASTRA supports clear, lawful and workable planning pathways for visitor accommodation. We support proportionate regulation, good management standards and evidence-based policy.

However, ASTRA is concerned that Draft Amendment PSA-25-3 risks adding another local layer of restriction to Tasmania's statewide visitor accommodation framework without clearly demonstrating that it will produce a meaningful housing benefit.

The amendment may instead reduce accommodation diversity, create uncertainty for owners and operators, compound regulatory complexity, and affect Hobart's visitor economy and broader accommodation needs.

ASTRA would welcome the opportunity to engage further with the City of Hobart, Council officers and relevant stakeholders to support a balanced, evidence-based approach.

ly,  
Yoa'v Tourel  
Board Chair  
Australia and New Zealand Short-Term Rental Association  
