

From: [REDACTED]
To: [Representation](#)
Subject: Formal Representation: Draft Amendment PSA-25-3 – Hobart Visitor Accommodation SAP
Date: Saturday, 4 July 2026 10:13:00 AM

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Draft Amendment PSA-25-3 – Hobart Visitor Accommodation SAP

To the Chief Executive Officer,

Please accept this formal representation regarding the proposed Hobart Visitor Accommodation Specific Area Plan (PSA-25-3). As a professional short-term rental manager/owner in Hobart, I support protecting housing amenity but urge the council to address the massive gap between official records and live platform data.

Key Evidence: The Platform vs. Council Data Gap

The Council Data Pool: Registers only 435 total "R7" permits across all residential zones.

The Live Reality (August Weekend Search)reveals 735 active listings in the

Hobart map area.

The Battery Point Discrepancy: Council records list only 16 active permits, yet the live platform shows 565 active listings for the same dates.

The Takeaway: Restricting *future* permits via a SAP will not resolve the housing crisis while hundreds of listings operate completely outside the council's permit registry.

Core Issues with the Current Framework

Exemption Exploitation: The current state scheme allows unhosted "home-sharing" for up to 4 bedrooms without a council permit.

High-Turnover Impact: This exemption allows large groups (e.g., 6 or more guests) to legally rotate through quiet residential streets, bypassing council safety, fire compliance, and parking reviews.

The Short Stay Levy Inequality: With a new short-stay levy set to collect a percentage on platform bookings, it is fundamentally unfair to compliant, permitted operators if a massive portion

of the unpermitted market continues to operate in the shadows, avoiding local compliance while honest hosts carry the burden.

The \$5,000 Fee Disincentive: With Council's recent fee increase for short-stay applications to \$5,000, there is now an immense financial incentive for rogue operators to bypass the system entirely. High fees without active enforcement will only expand the unpermitted shadow market.

The Battery Point Enforcement Failure: While the draft SAP technically excludes Battery Point on the basis that it has its own existing protections, live platform data showing 565 listings against just 16 official permits proves that localised zoning restrictions are entirely ineffective without proactive, data-driven enforcement.

Flawed Enforcement: The current system relies entirely on complaint-driven tracking, placing the burden on local neighbors to police disruptive or unpermitted commercial setups.

Formal Recommendations for Council

Leverage the Levy Data Stream: Use the data pipelines generated by the new platform short-stay levy laws to cross-reference platform returns directly with Hobart's permit registry. This will ensure the council captures unregistered properties and levels the playing field.

Proactive Data Auditing: Move away from complaint-driven enforcement by actively auditing live booking platform data against the council permit registry.

Exempted Listing Registry: Require any property operating under a "home-sharing" or room-only exemption to register its capacity with the council to ensure accountability.

Level the Playing Field: Ensure unpermitted commercial operations face strict penalties to protect the community and support legitimate, compliant hosts who follow the rules.

Thank you for considering this submission.

Sincerely,

Debra Martin-Wells

