

**From:** Maureen Aiken <maureenaiken11@gmail.com>  
**Sent:** Saturday, 2 April 2022 2:21 PM  
**To:** CoH Mail  
**Subject:** TRIM: AirBnB

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Hobart City Council

I am delighted that you have seen fit, and have found the courage, to raise questions about allowing the current situation with AirBnB operators to continue.

Tasmanians have been plunged into a severe rental crisis over the “open slather” approach that has been allowed to continue unabated here.

Rampantly greedy investors have decimated the previously available rental housing stock. At the same time their actions have also sent property prices in Hobart to sky-high levels – effectively locking normal Tasmanian wage earners out of the property market completely. Families are now being made homeless by the astronomical rents being charged by greedy landlords. There are families who are working long hours just to keep their over-crowded, low-quality rental roofs over their heads, struggling to buy life’s essentials, or to provide for their families’ future needs.

This state of affairs is utterly appalling, and is ruining the quality of the lives of ordinary Tasmanians, while rich investors grow ever richer by exploiting loopholes in our beautiful home City’s planning laws, and buy up ever more homes that come onto the market. The homelessness and hopelessness caused by unrestricted and unfettered exploitation by greedy investors is nothing new. There have been news organisations reporting on this very same situation in other countries, such as one investigative news program I saw on Spain some years ago. Their government had to finally step in to restrict and curtail all AirBnB operators, so that their citizens who were homeless on the streets could finally secure housing. Once some restrictions were put in place, the rental crisis was averted, and greedy investors were forced out of their exploitative activities. Situation normal returned, and I doubt that any AirBnB operator there became homeless themselves, or suffered any devastating economic disadvantage as a result!

Any investor who chooses to lock up their otherwise vacant property solely for profiting from high short-stay accommodation prices, should pay much higher rates and other charges for the privilege of doing so. They should also be regulated, so that no mega property “barons” are allowed to expand their personal property empire, purely for profit. If they wish, let them build new housing for that purpose, and not “steal” from the existing available housing stock.

Another appalling situation that requires an urgent remedy, is the poor sub-standard condition that many rental properties are in, but the tenants are still compelled to pay astronomical rents. Many of these properties are old and decaying rapidly, but the landlord is demanding the same rent as a good-quality standard home would generate. In other countries, there are restrictions placed on the amount of rent that can be charged for such old and sub-standard homes. I would love to see such a plan implemented in Hobart. Each rental property needs to be assessed as to its amenity level according to a scale, and rents restricted accordingly. The current situation is unfair, and unconscionable.

Ordinary Tasmanians are suffering. Our beautiful and much-loved city is losing all that we have treasured about living here.

Let us all see fairness and equity and social justice be restored to us, before Hobart “loses it Soul” altogether.

Thank you.

Maureen Aiken

6/30 Ratho Street

Lenah Valley TAS 7008



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**From:** Helma <helken@iprimus.com.au>  
**Sent:** Tuesday, 5 April 2022 11:27 AM  
**To:** Representation  
**Subject:** Short-Stay

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It is difficult to understand why commercial activities with short-stay are allowed to be in almost any suburban residential location. The constant comings and goings of strangers is not helping family environments. Other places have strict regulations about short-stay which are mostly attached to the property of the land-lord. Whole houses are only leased for 1 year to people with professional transfers new to the city, which can be extended if needed. Otherwise whole houses are let to permanent tenants with rent calculated and regulated to a certain percentage of the tenants income. It becomes their home. The land-lord can only terminate the lease if the tenant damages the property or uses it for other purpose or the owner needs the house or apartment for own use. A housing ombudsperson is available to resolve disputes if needed. New regulations ought to be made urgently and ought to include past, present and future accommodation short-stays. It would be unfair to say, only from today on, it needs to be the same for everybody who has extra property to rent. The mum and dad investors still keep their investment and extra income as before, but better regulated.

Helma Stevenson  
72 Terrina Street  
Lauderdale 7021  
Ph: 62511099



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**From:** Don McCrae <Don.Mccrae@salvationarmy.org.au>  
**Sent:** Thursday, 7 April 2022 9:57 AM  
**To:** Representation  
**Cc:** Jed Donoghue  
**Subject:** Short Stay Accommodation  
**Attachments:** Short Stay Accommodation Letter March 2022.pdf

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Dear Friends

Please find letter regarding the Short Stay Accommodation attached.

Kind regards

Don



**Don McCrae**

**Homelessness and Corrections Manager**

SASH Salvation Army Supported Housing

Street to Home

Beyond The Wire (Throughcare For Returning Citizens)

**The Salvation Army Australia Territory**

[salvationarmy.org.au](http://salvationarmy.org.au)

**Email:** [don.mccrae@salvationarmy.org.au](mailto:don.mccrae@salvationarmy.org.au)

**Address:** 117 New Town Road, New Town, TAS 7008

**Mail:** PO Box 43

**Phone:** (03) 6278 2817

**Mobile:** 0409 588 042 **Fax:** (03) 6278 1542

**Want to know more about our local activities?**

[Click here to find out!](#)



Wherever there is hardship or injustice, Salvos will live, love and fight, alongside others, to transform Australia one life at a time with the love of Jesus.

*Through our commitment to reconciliation, The Salvation Army acknowledges the First Nations peoples of Australia as the traditional custodians of this land. We further acknowledge and pay our respects to past and present Elders, giving thanks for their wisdom that has sustained their people since the beginning of time, and we pledge to support emerging and future generations.*



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April 8<sup>th</sup> 2022

**Representation from The Salvation Army Tasmania to the Short Stay Accommodation –  
Proposed Amendments to the Hobart Interim Planning Scheme**

Dear Sir/Madam

The Salvation Army provides accommodation and support to people who are at risk of homelessness and to people who are experiencing homelessness in Tasmania. The Salvation Army supports the Short Stay Accommodation- Proposed Amendments to the Hobart Interim Planning Scheme.

The Salvation Army supports this proposal to limit further increases to the number of entire homes used for short stay accommodation. In Hobart's current rental crisis, it is vital to prioritise the use of properties for long term rental homes for local people. Adopting the proposed recommendations will help to balance the use of residential properties for visitors and for people who live in Hobart.

This proposed amendment will enable the City of Hobart to limit new visitor accommodation involving entire dwellings in specified areas of Hobart. Importantly, they have no effect on existing short stay visitor accommodation and will not affect people who are sharing their own home. The limitations apply only to entire investment properties being newly listed for visitor accommodation.

Renters in the Hobart LGA and across Tasmania are currently experiencing an entrenched crisis of affordability and availability.

- The density of short stay accommodation in Hobart is the highest of any capital city in Australia, and one of the highest in the world.
- Vacancy rates in Hobart's private rental market are persistently below 1%, when a sustainable vacancy rate is 2.5-3%.
- The December 2021 [Rental Affordability Index](#) showed that Hobart is still the least affordable capital in Australia.
- Even households on average incomes, including key workers such as nurses, teachers and officers in police and emergency services, are paying over 30%, and up to 80% of their income in rent.
- The December 2020 AHURI report [Marginal housing during COVID-19](#) shows the clear impact of short stay accommodation on Hobart's vacancy rates.

Founders William & Catherine Booth  
General Brian Peddle

*Wherever there is hardship or injustice, Salvos will live, love and fight  
alongside others to transform Australia one life at a time with the love of Jesus*

**salvationarmy.org.au**

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at February 2022, there were 4407 applications for social housing, and this number keeps going up.<sup>1</sup> Limiting the number of entire homes available for short stay accommodation is part of the solution to Tasmania's rental housing crisis, because every available home counts.

Establishing this planning amendment in the Hobart LGA will enable other local governments to take similar action where high levels of entire home visitor accommodation are impacting the long-term rental market.

In light of the detrimental impact that short stay accommodation has had on the availability of long term rental properties, The Salvation Army supports the proposal to limit any increase to the number of entire homes used for short stay accommodation that could otherwise be used by local people to rent long term.

Your sincerely



Don McCrae

Acting State Manager Homelessness  
The Salvation Army Australia Territory  
[salvationarmy.org.au](http://salvationarmy.org.au)  
Email: [don.mccrae@salvationarmy.org.au](mailto:don.mccrae@salvationarmy.org.au)  
Address: 117 Main Road, New Town 7008  
Phone: 62782817  
Mobile: 0409588042

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Founders William & Catherine Booth  
General Brian Peddle

*Wherever there is hardship or injustice, Salvos will live, love and fight  
alongside others to transform Australia one life at a time with the love of Jesus*

**salvationarmy.org.au**

**From:** Chris Merridew <cmerridew2@gmail.com>  
**Sent:** Thursday, 7 April 2022 1:43 PM  
**To:** CEO - City of Hobart  
**Cc:** Representation  
**Subject:** PSA - 22-1 Amendment Short Stay Accommodation

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Air B&B restrictions is bordering on Restrictive Trade Practices but including an alternative approach to “affordable rentals “

Dear Ms Grigsby,

> The Aldermen of The City of Hobart which has some 23700 residences, of those 6800 (29%) are family rentals, shouldn't be under the illusion that 480 (2%) being Air B&Bs contribute so dramatically to the affordable housing crisis that the HCC would consider entering into virtually restrictive trade practices with the of banning of further AirB&B permits .

Hobart Municipality which sits between Taroona and Creek Road is not just Battery Point which has not been “affordable ”since the late 1960s - Empress Towers opened in 1967 . The 23700 residential Rate payers could feel most precarious about such a restriction being mandatorily placed on their property .and consequently should express such to the CEO. The planning department is already clearly being swamped by property owners seeking to achieve Air B&B approvals whilst they still can .

> The Council acclaims that some 450 inner city new build residential units were approved in 2020 but the physical work on the first of these premium units barely commenced in 2021.

> Most were sold off the plan presumably as residences ,an argument for their density approval was that they would release older“affordable”property to come on the market else where in Hobart . Some were no doubt purchased with a view to supporting Tasmania's burgeoning Tourism how might their plans now stand ?

Alternative Action for Council to Consider.

The HCC collects say in the order of \$2M per week from residential rate payers including in the order \$0.6M from the 6900 residential rentals of (\$88) per week . To ease the affordable rental issues I note that the Treasurer has implemented some Land Tax reviews which on land value of \$520,000 will then reduce from (\$109)to (\$105) per week - I also note that the Valuer General has flagged a revaluation will take place this year ! So add Tas Water currently the landlord has to find (\$210 PwK ), \$10920 pa to pay just instrumentalities ,before any maintenance , Insurance or mandatory refresh's cost between tenants .

With “affordable “ rental pitched at \$400 ,but “actual”is nearer \$ 500 in which the tenant may get rent assistance, you can appreciate the appeal of Air B&B 3 bedroom house returning \$330 per night . Note without landlords there aren't any rentals affordable or otherwise !

The Council might look to how it can encourage Mum and Dad investors in providing affordable rentals by introducing a reduced Rates package qualified through the Lease contract. If only both the Council Rates and Land Tax were halved there is a \$100 per week reduction in rent . It would take a brave Council to address effectively the housing emergency with support of this

nature .The Council's desire to limit A&B which is only 2% of the rental stock is detrimental to our Tourism growth of a much valued experience for those who visit and spend in our City .

Manipulating with private enterprise especially in retrospect, how many of those 450 Unit Sales off the plan in 2020 were potentially with tourism development in mind, is perhaps not the Council's core business .

Regards

Chris Merridew

Sandy Bay

0419 252818

[cmerridew2@gmail.com](mailto:cmerridew2@gmail.com)

>

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>

**From:** Tracey Mawbey <tmawbey@hobartcitymission.org.au> on behalf of Harvey Lennon <hlennon@hobartcitymission.org.au>  
**Sent:** Thursday, 7 April 2022 5:11 PM  
**To:** Representation  
**Subject:** Short Stay Accommodation  
**Attachments:** Letter to City of Hobart re short stay accom 07.04.2022.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon,

Please find letter attached with regard to the above.

Kind regards

Kind regards

**Tracey**  
**Tracey Mawbey**  
**On behalf of Harvey Lennon, CEO**  
Hobart City Mission

Phone: 6215 4211

Email: [tmawbey@hobartcitymission.org.au](mailto:tmawbey@hobartcitymission.org.au)

Web: [www.hobartcitymission.org.au](http://www.hobartcitymission.org.au)



ABN: 45 880 587 855 - Hobart City Mission is a registered charity in accordance with the Australian Charities and Not-For-Profits Commission (ACNC). Please consider the environment before printing.

*Hobart City Mission, through our values and practices acknowledge the sovereignty of Tasmanian Aborigines, the original owners of lutruwita (Tasmania). Tasmanians represent many cultures, social and economic backgrounds, all abilities, genders, sexualities and stages of life. We see strength in them all and embrace this diversity. Hobart City Mission understand that to truly meet diverse needs, we must model diversity, inclusion and healthy relationships at every level of our organisation, and we are committed to doing so.*





7 April 2022

The General Manager  
City of Hobart

By email to [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

Dear Ms Grigsby

**Representation from Hobart City Mission to the Short Stay Accommodation – Proposed Amendments to the Hobart Interim Planning Scheme**

Hobart City Mission is a not-for-profit homelessness service which has been providing help to those who need it most in the Greater Hobart area for 170 years. We provide accommodation and support to those experiencing homelessness in our community including emergency accommodation and emergency relief services such as financial counselling, food packs and grocery and fuel vouchers.

**Hobart City Mission supports the Short Stay Accommodation- Proposed Amendments to the Hobart Interim Planning Scheme**

Our organisation supports this proposal to limit further increases to the number of entire homes used for short stay accommodation. In Hobart's current rental crisis, it is vital to prioritise the use of properties for long term rental homes for local people. Adopting the proposed recommendations will help to balance the use of residential properties for visitors and for people who live in Hobart.

This proposed amendment will enable the City of Hobart to limit new visitor accommodation involving entire dwellings in specified areas of Hobart. Importantly, they have no effect on existing short stay visitor accommodation, and will not affect people who are sharing their own home. The limitations apply only to entire investment properties being newly listed for visitor accommodation.

Renters in the Hobart LGA and across Tasmania are currently experiencing an entrenched crisis of affordability and availability.

- The density of short stay accommodation in Hobart is the highest of any capital city in Australia, and one of the highest in the world.
- Vacancy rates in Hobart's private rental market are persistently below 1%, when a sustainable vacancy rate is 2.5-3%.
- The December 2021 [Rental Affordability Index](#) showed that Hobart is still the least affordable capital in Australia.



- Even households on average incomes, including key workers such as nurses, teachers and officers in police and emergency services, are paying over 30%, and up to 80% of their income in rent.
- The December 2020 AHURI report [Marginal housing during COVID-19](#) shows the clear impact of short stay accommodation on Hobart's vacancy rates.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at February 2022, there were 4407 applications for social housing, and this number keeps going up.<sup>1</sup> Limiting the number of entire homes available for short stay accommodation is part of the solution to Tasmania's rental housing crisis, because every home counts.

Establishing this planning amendment in the Hobart LGA will enable other local governments to take similar action where high levels of entire home visitor accommodation are impacting the long term rental market.

In light of the detrimental impact that short stay accommodation has had on the availability of long term rental properties, Hobart City Mission supports the proposal to limit any increase to the number of entire homes used for short stay accommodation that could otherwise be used by local people to rent long term.

For further information, please contact Ewan Higgs on [ehiggs@hobartcitymission.org.au](mailto:ehiggs@hobartcitymission.org.au)

Yours faithfully



Harvey Lennon  
**CEO – HOBART CITY MISSION**

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<sup>1</sup> [https://www.communities.tas.gov.au/housing/tasmanian\\_affordable\\_housing\\_strategy/reporting](https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting)

**From:** Tania Hunt <tania.hunt@ynot.org.au>  
**Sent:** Friday, 8 April 2022 11:37 AM  
**To:** Representation  
**Subject:** Short Stay Accommodation  
**Attachments:** HCC Short Stay Accommodation Letter 08042022.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

Please find attached correspondence from the Youth Network of Tasmania in relation to Short Stay Accommodation.

Kind regards, Tania

**Tania Hunt**  
CEO  
Youth Network of Tasmania  
Pronouns: she/her



a: Level 12, 39 Murray Street, Hobart Tas 7000  
m: 0427 466 189  
e: [ceo@ynot.org.au](mailto:ceo@ynot.org.au)  
w: [www.ynot.org.au](http://www.ynot.org.au)

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8 April 2022

## **Representation from The Youth Network of Tasmania to the Short Stay Accommodation – Proposed Amendments to the Hobart Interim Planning Scheme**

The Youth Network of Tasmania (YNOT) is the peak body for young people aged 12-25 years and the non government youth sector in Tasmania. YNOT works to ensure policies affecting young people in Tasmania are relevant, equitable and effective and that young people have a voice on issues that matter to them. Our purpose is to drive positive change with young people and the youth sector in Tasmania.

### **YNOT supports the Short Stay Accommodation - Proposed Amendments to the Hobart Interim Planning Scheme**

YNOT supports this proposal to limit further increases to the number of entire homes used for short stay accommodation. In Hobart's current rental crisis, it is vital to prioritise the use of properties for long term rental homes for local people. Adopting the proposed recommendations will help to balance the use of residential properties for visitors and for people who live in Hobart.

We know from speaking with young Tasmanians aged 18-25 years that they are eager to leave home and live on their own for the first time. However, attempting to negotiate and enter the rental market is daunting as many young people are priced out of the market. Median rental prices in our major cities **exceed youth allowance** by \$140 per week and Job Seeker by \$85 per week.<sup>[1]</sup> Young people are susceptible to transport disadvantage and need access to affordable housing close to public transport within Hobart. This is particularly important in accessing essential services and sustaining engagement in education, training and employment.

This proposed amendment will enable the City of Hobart to limit new visitor accommodation involving entire dwellings in specified areas of Hobart. Importantly, they have no effect on existing short stay visitor accommodation, and will not affect people who are sharing their own home. The limitations apply only to entire investment properties being newly listed for visitor accommodation.

Renters in the Hobart LGA and across Tasmania are currently experiencing an entrenched crisis of affordability and availability.

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- Vacancy rates in Hobart's private rental market are persistently below 1%, when a sustainable vacancy rate is 2.5-3%.
- The December 2021 [Rental Affordability Index](#) showed that Hobart is still the least affordable capital in Australia.

- Even households on average incomes, including key workers such as nurses, teachers and officers in police and emergency services, are paying over 30%, and up to 80% of their income in rent.
- The December 2020 AHURI report [Marginal housing during COVID-19](#) shows the clear impact of short stay accommodation on Hobart's vacancy rates.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at February 2022, there were 4407 applications for social housing, and this number keeps going up.<sup>i</sup> A significant proportion of social housing applicants are young people. Limiting the number of entire homes available for short stay accommodation is part of the solution to Tasmania's rental housing crisis, because every home counts.

Establishing this planning amendment in the Hobart LGA will enable other local governments to take similar action where high levels of entire home visitor accommodation are impacting the long term rental market.

In light of the detrimental impact that short stay accommodation has had on the availability of long term rental properties, YNOT supports the proposal to limit any increase to the number of entire homes used for short stay accommodation that could otherwise be used by local people to rent long term.

For further information, please contact:

Tania Hunt  
Chief Executive Officer  
[ceo@ynot.org.au](mailto:ceo@ynot.org.au)

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<sup>[i]</sup> Tenants' Union of Tasmania 2021. Tasmanian Rents December Quarter 2021.

<sup>i</sup> [https://www.communities.tas.gov.au/housing/tasmanian\\_affordable\\_housing\\_strategy/reporting](https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting)

**From:** Sharon Moore <sharonm@riseup.net>  
**Sent:** Friday, 8 April 2022 1:30 PM  
**To:** Representation  
**Subject:** PSA-22-1 Amendment – Short Stay Accommodation

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Chief Executive Officer  
City of Hobart

Dear Ms Griggs

I wholeheartedly support the council's proposed planning amendment to limit short-stay accommodation in Hobart.

I can only see this amendment having positive impacts: ensuring houses that might have become short-term accommodation continue to be available for rental, thus relieving some of the stress on the rental housing market in Hobart; ensuring continued social viability of residential areas, ie that they do not become short-term accommodation deserts; relieving the potential impacts of short-term accommodation on nearby residents, such as noise and pressure on parking.

I only wish it could be applied retrospectively.

Many thanks

Sharon

Sharon Moore  
9 Quayle St  
Sandy Bay 7005

**From:** Maureen Aiken <maureenaiken11@gmail.com>  
**Sent:** Saturday, 9 April 2022 12:05 PM  
**To:** Representation  
**Subject:** PSA-22-1 Amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Chief Executive Officer,  
Hobart City Council.

Dear Sir/Madam

I am attaching below my comments I sent via an email to the HCC last week. I was advised to make my submission via your website.

I am now taking advantage of the stated opportunity to submit my comments via an email addressed to you.

I am hoping that this approach will be acceptable?

Thank you.

Maureen Aiken

6/30 Ratho Street, LENA VALLEY 7008

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Dear Hobart City Council

I am delighted that you have seen fit, and have found the courage, to raise questions about allowing the current situation with AirBnB operators to continue.

Tasmanians have been plunged into a severe rental crisis over the “open slather” approach that has been allowed to continue unabated here.

Rampantly greedy investors (many of whom I suspect originated from interstate) have decimated the previously available amount of rental housing stock. At the same time their actions have also sent property prices in Hobart soaring to sky-high levels – effectively locking average Tasmanian wage earners out of the property market completely.

Families are now also being made homeless by the astronomical rents being charged by greedy landlords. There are families who are working long hours just to keep their overcrowded, low-quality rental roofs over their heads, struggling to buy life’s essentials, or to provide for their families’ future needs.

This state of affairs is utterly appalling, and is ruining the quality of the lives of ordinary Tasmanians, while rich (interstate?) investors grow ever richer by exploiting loopholes in our beautiful home City’s planning laws, and buy up ever more homes that come onto the market, solely to be used for short-stay accommodation at stratospheric rates.

The homelessness and hopelessness caused by unrestricted and unfettered exploitation by greedy investors is nothing new. There have been news organisations reporting on this very same situation in other countries, such as one investigative news program I saw on Spain some years ago. Their government had to finally step in to restrict and curtail all AirBnB operators, so that their citizens who were homeless on the streets could finally secure housing. Once some restrictions were put in place, the rental crisis was averted, and greedy investors were forced out of their exploitative activities. “Situation normal” returned, and I

doubt that any AirBnB operator there became homeless themselves, or suffered any devastating economic disadvantage as a result!

Any investor who chooses to lock up an otherwise vacant property solely for profiting from high short-stay accommodation prices, should pay much higher rates and other charges for the privilege of doing so. They should also be regulated, so that no mega property “barons” are allowed to expand their personal property empire here in Tasmania, purely for profit. If they wish, let them build new housing for that purpose, and not “steal” from the existing available housing stock.

Another appalling situation that requires an urgent remedy, is the poor sub-standard condition that many rental properties are in, but the tenants are still compelled to pay astronomical rents. Many of these properties are old and decaying rapidly, but the landlord is demanding the same rent as a good-quality standard home would generate. In other countries, there are restrictions placed on the amount of rent that can be charged for such old and sub-standard homes. I would love to see such a plan implemented in Hobart. Each rental property needs to be assessed as to its amenity level according to a scale, and rents restricted accordingly. The current situation is unfair, and unconscionable.

Ordinary Tasmanians are suffering.

Our beautiful and much-loved city is losing all that we have treasured about living here.

Let us all see fairness and equity and social justice be restored to us, before Hobart “loses it Soul” altogether.

Thank you.

Maureen Aiken

6/30 Ratho Street

Lenah Valley TAS 7008



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**From:** Cr Helen Burnet  
**Sent:** Sunday, 10 April 2022 8:48 PM  
**To:** Representation  
**Subject:** Fwd: PSA 1-22 short stay visitor accommodation

Helen Burnet  
0417284267

Begin forwarded message:

**From:** Cr Helen Burnet  
**Date:** 10 April 2022 at 8:44:39 pm AEST  
**To:** representation@hobartcoty.com.au  
**Cc:** Lucy  
**Subject:** Fwd: PSA 1-22 short stay visitor accommodation

I submit this on behalf of Ms Lucy Jones.

Please reply to both in acknowledgment.

Many thanks

Helen

Helen Burnet  
0417284267

Begin forwarded message:

**From:** Lucy  
**Date:** 10 April 2022 at 5:17:04 pm AEST  
**To:** Cr Helen Burnet  
**Subject:** short stay visitor accommodation  
**Reply-To:** Lucy

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To the Hobart City Council



I strongly object to the use of whole houses, Units and Apartments as visitor accommodation.

This has become a way to enrich the wealthy and leave our struggling singles and families completely out of the Housing market.

I regularly see applications in the "Mercury" from property owners wishing to cash in on this lucrative market.

It has to stop. It is not fair.

Elizabeth Lucy Jones

11 Lord St

Sandy Bay.

6224 8494

**From:** Emma Greenhalgh <emma.greenhalgh@shelter.org.au>  
**Sent:** Monday, 11 April 2022 2:51 PM  
**To:** Representation  
**Cc:** 'Cynthia Townley'  
**Subject:** RE Short Stay Accommodation- Proposed Amendments to the Hobart Interim Planning Scheme  
**Attachments:** 20220411 Letter City of Hobart AirBnB 1.0.pdf

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Good afternoon

Please find attached a letter of representation regarding the proposed amendments to the Hobart Interim Planning Scheme, specifically short stay accommodation.

Kind regards  
Emma



**Emma Greenhalgh**

Chief Executive Officer

m 0402 927 243 e [emma.greenhalgh@shelter.org.au](mailto:emma.greenhalgh@shelter.org.au) w <http://www.shelter.org.au>



We acknowledge Aboriginal and Torres Strait Islander peoples as the traditional custodians of the land where we live, learn, and work.

Always was, always will be Aboriginal land.



11<sup>th</sup> April 2022

Chief Executive Officer  
GPO Box 503  
Hobart TAS 7001  
[representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

Dear Ms Grigsby

**RE Short Stay Accommodation- Proposed Amendments to the Hobart Interim Planning Scheme**

I am writing to you about the recent decision by the City of Hobart to limit further increases to the number of whole of homes used for short stay accommodation.

National Shelter is a non-government peak organisation that aims to improve housing access, affordability, appropriateness, safety and security for people on low incomes. Since 1976, National Shelter has worked towards this goal by influencing government policy and action, and by raising public awareness about housing issues. National Shelter is supported by state and territory Shelter network, including Shelter Tasmania.

As you know, the Hobart local government area and Tasmania more generally, is experiencing a housing crisis with housing being neither affordable nor available:

- The density of short stay accommodation in Hobart is the highest of any capital city in Australia, and one of the highest in the world
- Vacancy rates in Hobart's private rental market are persistently below 1%, when a sustainable vacancy rate is 2.5-3%
- The December 2021 [Rental Affordability Index](#) showed that Hobart is still the least affordable capital in Australia.
- Even households on average incomes, including key workers such as nurses, teachers and officers in police and emergency services, are paying over 30%, and up to 80% of their income in rent.
- The December 2020 AHURI report [Marginal housing during COVID-19](#) shows the clear impact of short stay accommodation on Hobart's vacancy rates.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at February 2022, there were 4407 applications for social housing.<sup>1</sup>

National Shelter supports the submission by our colleagues at Shelter Tasmania for the City of Hobart to endorse the proposed amendment to limit new visitor accommodation involving entire dwellings in specified areas of Hobart. We agree that this approach should have no effect on existing short stay visitor accommodation and will not affect people who are sharing their own home. The limitations apply only to entire investment properties being newly listed for visitor accommodation.

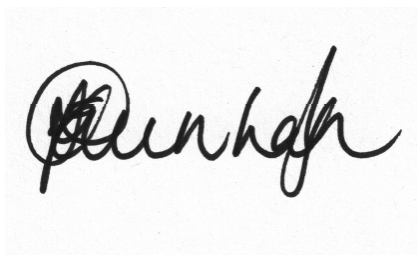
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<sup>1</sup> [https://www.communities.tas.gov.au/housing/tasmanian\\_affordable\\_housing\\_strategy/reporting](https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting)

We commend the City of Hobart for its leadership on this issue, and encourage the council to continue to develop a suite of responses to actively assist the growth of new social and affordable housing to re-balance the housing market so Hobart can remain a home for all households.

Please contact me if you require further information on 0402 927 243 or at [emma.greenhalgh@shelter.org.au](mailto:emma.greenhalgh@shelter.org.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emma Greenhalgh', written in a cursive style.

Emma Greenhalgh  
**Chief Executive Officer**

**From:** Deb Lewis <debral@cotatas.org.au>  
**Sent:** Tuesday, 12 April 2022 4:18 PM  
**To:** Representation  
**Subject:** Representation - short stay accommodation  
**Attachments:** COTA Tasmania representation re short stay accommodation.docx

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please find attached a copy of COTA Tasmania's representation to the Council in respect of short stay accommodation.

Kind regards

**Deb Lewis (she/her)**

Operations Manager (Tuesday to Friday)

**COTA TAS**

Level 12, 39 Murray Street, Hobart TASMANIA 7000

P: 03 6231 3265

[www.cotatas.org.au](http://www.cotatas.org.au)



12 April 2022

Hobart City Council  
16 Elizabeth Street  
Hobart TAS 7000

By email to [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

### **Representation from COTA Tasmania to the Short Stay Accommodation – Proposed Amendments to the Hobart Interim Planning Scheme**

COTA Tasmania (Council on the Ageing [Tas] Inc) is a not-for-profit organisation, operating as a peak body for a wide range of organisations and individuals who are committed to encouraging our community to think positively about ageing. This involves promoting and encouraging social inclusion and championing the rights and interests of Tasmanians as they age.

COTA Tasmania supports this proposal to limit further increases to the number of entire homes used for short stay accommodation. In Hobart's current rental crisis, it is vital to prioritise the use of properties for long term rental homes for local people. We have a particular interest in the impact of the rental crisis on older Tasmanians, in particular older women who are often even more adversely impacted for a range of reasons. Adopting the proposed recommendations will help to balance the use of residential properties for visitors and for people who live in Hobart.

This proposed amendment will enable the City of Hobart to limit new visitor accommodation involving entire dwellings in specified areas of Hobart. Importantly, they have no effect on existing short stay visitor accommodation and will not affect people who are sharing their own home. The limitations apply only to entire investment properties being newly listed for visitor accommodation.

Renters in the Hobart LGA and across Tasmania are currently experiencing an entrenched crisis of affordability and availability.

- The density of short stay accommodation in Hobart is the highest of any capital city in Australia, and one of the highest in the world.
- Vacancy rates in Hobart's private rental market are persistently below 1%, when a sustainable vacancy rate is 2.5-3%.
- The December 2021 [Rental Affordability Index](#) showed that Hobart is still the least affordable capital in Australia.

Patron

*Her Excellency the Honourable Barbara Baker AC,  
Governor of Tasmania*

- Even households on average incomes, including key workers such as nurses, teachers and officers in police and emergency services, are paying over 30%, and up to 80% of their income in rent.
- The December 2020 AHURI report [Marginal housing during COVID-19](#) shows the clear impact of short stay accommodation on Hobart's vacancy rates.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at February 2022, there were 4407 applications for social housing, and this number keeps going up.<sup>1</sup> Limiting the number of entire homes available for short stay accommodation is part of the solution to Tasmania's rental housing crisis, because every home counts.

Establishing this planning amendment in the Hobart LGA will enable other local governments to take similar action where high levels of entire home visitor accommodation are impacting the long-term rental market.

In light of the detrimental impact that short stay accommodation has had on the availability of long-term rental properties, COTA Tasmania supports the proposal to limit any increase to the number of entire homes used for short stay accommodation that could otherwise be used by local people to rent long term.

For further information, please contact

Debra Lewis  
**Acting CEO**  
**COTA Tasmania**  
Debral@cotatas.org.au

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<sup>1</sup> [https://www.communities.tas.gov.au/housing/tasmanian\\_affordable\\_housing\\_strategy/reporting](https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting)

**From:** Elaine Johns <elaine\_johns@hotmail.com>  
**Sent:** Wednesday, 13 April 2022 6:46 PM  
**To:** Representation  
**Subject:** Short Stay Amendment - Visitor Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

The draft amendment proposes to insert a new qualification under the definition of 'Visitor accommodation' in the General Residential Zone, the Inner Residential Zone, and the Low Density Residential Zone of the *Hobart Interim Planning Scheme 2015*.

I wish to make a representation on the above issue.

General Residential Zone, Inner Residential Zone and Low Density Zones are where people live, they are not a holiday resort. I am opposed to 'WHOLE HOUSES' being used as short stay Visitor Accommodation. We, as citizens have a moral obligation to support and protect our community, its values and living standards and we also have to ensure that there is somewhere affordable for people who live and work in Hobart to live.

I have lived in Sandy Bay since 1981, in a General Residential Zone and sadly have watched our community and its values disappear. In recent years I have witnessed many nearby whole houses have become Airbnb Visitor Accommodation. I want to "know my neighbours" and support the community ideals however short stay Visitor Accommodation is eroding that.

I FULLY SUPPORT the Hobart City Council in this proposal.

Elaine Johns  
12 Edith Ave  
Sandy Bay



**From:** Farida Pambos <effahouse@hotmail.com>  
**Sent:** Thursday, 14 April 2022 3:42 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

It's my back up plan to retire when I turn 70. In meantime, I can't afford to have house empty so when I decided to put on Air BnB. at least that income pays Bills while i still have to pay its mortgage. Without that income, I won't be able to afford all Bills relating to the house. I still work and live in Sydney to keep up with mortgage before I migrate to Tasmania In future. I just have another 8 years to retirement, hoping my Super will be enough to pay the rest of mortgage. I visited Tasmania in 2004 and took me 12 years to finally have a courage to buy property there with retirement in mind. I fell in love with Tasmania. The lifestyle is more relax than Sydney. So I don't know why Council restricted Air b&B. Isn't it good for Tasmania? More people all over the world, will visit Tasmania in some point. I had guests from Germany, Singapore, US etc. Let alone those from other States within Australia. During first Pandemic when Tasmania government gave Tasmanians travel voucher, they used them to stay at air BnB.

For example, the benefits it provides to local businesses in your neighbourhood and the broader tourism industry

Some like staying in Hotels. For almost if not more price, they prefer to rent houses for confirt

Regards,  
Farida Pambos

**From:** Chris Hitching <chris@hitching.net>  
**Sent:** Thursday, 14 April 2022 3:43 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Home sharing attracts people to visit locations that they wouldn't otherwise go to... not everyone wants to, or can afford to, stay in hotels. Particularly ones (I'm thinking of places like the Grand Chancellor) that offer poor value for money. Many people's livelihoods depend on the tourist dollar.

Fundamentally, though, I don't think this is a good solution to the problem. If we need more affordable housing, free up land for public and private development. Build more, and leverage the laws of supply and demand, rather than telling private asset owners (and rate payers) what they can and can not do with their property.

Regards,  
Chris Hitching

**From:** Qiuyang Meng <mengqiuyang123@gmail.com>  
**Sent:** Thursday, 14 April 2022 3:44 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Being hosting guests can provide me many benefits, includes economically, and self-satisfaction.

There are very limited hotels in Hobart, and many of them are old and unattractive.

Hobart is heavily depended on tourism as here has no other pillar industry, and the number of hotel are extremely limited. Banning short stay accommodation will stopping tourists coming, as they simply can't find a place to stay.

Regards,  
Qiuyang Meng

**From:** Kat little <kat@urbanstaysgroup.com.au>  
**Sent:** Thursday, 14 April 2022 8:42 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Hotels dominate the market and get away with doing whatever they want whenever they want. The hosting community offers all guests an alternative to the hotel model that is generally owned by international companies with the profits leaving the country. Airbnb properties within Hobart are generally owned by locals and support locals and the money stays in the state.

Home sharing is fundamental to Hobart as is the tourism industry. The houses that are provided for guests in a home sharing model have had thousands of individual owners money spent on them not the governments money. And the guests contribute large amounts of money to the local business owner, far more than 6 people in a share house would ever contribute.

A ban on home sharing just makes the international hotel chains richer and the local community poorer. This does not fix the housing issues in Hobart and it is ridiculous to think that a 4 bedroom home in Sandy bay that will rent for \$1,200 a week in the rental market is affordable to those looking for welfare housing. Tourist's want choices and families travelling have shown us that they can't get family rooms in hotels so they choose short stay properties. We will just loose these tourists to other states.

Regards,  
Kat little

**From:** Mark Redmond <markredmond64@gmail.com>  
**Sent:** Thursday, 14 April 2022 8:43 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Hosting brings visitors to Hobart and they spend money here. My family gets to see the broader world horizon in our back yard, enriching our islands reputation as welcoming.

Mixed neighbourhoods, money into the economy, fills empty houses, brings vitality to hobart

No direct impact on me. However this decision steps around the big decisions that need to be made re housing supply. Professionals and families need housing, not just the quarter acre block but medium density apartment style in the CBD. Councils and gov at all levels need to take the bull by the horns and invest in medium density planning and infrastructure that will meet existing demand for apartments, not more broad acre housing that depletes valuable agricultural land, stretches service supply costs and transport/school demand.

Regards,  
Mark Redmond

**From:** Kerry Burns <kburns@netspace.net.au>  
**Sent:** Monday, 18 April 2022 1:43 PM  
**To:** Representation  
**Subject:** PSA-22-1 Amendment – Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart

I am writing in support of the proposed amendments to restrict future whole-of-home short stay accommodation permits in Hobart (PSA-22-1 Amendment – Short Stay Accommodation).

The current short-stay accommodation arrangements are having negative effects on the community that include:

- Reducing the supply of properties for purchase or long term rental by local residents at a time of acute housing shortage;
- Contributing to high property prices that restrict access to the market for both potential home buyers and long term renters;
- A corrosive impact on local communities (such as Glebe) by having short stays replace local residents and thereby 'hollowing out' neighbourhoods; and
- In some localities, having a significant nuisance and noise impact on adjacent properties.

There is evidence that whole-of-house short stay accommodation is having a direct impact on housing cost and availability in Hobart – and particularly in inner suburbs of the city. The proposed amendments have the potential to have real benefits for Tasmanians seeking long term housing and in helping to maintain the integrity of local communities

I would also support the idea of a differential rate regime for whole-of-home short stay accommodation to help offset the cost to the community (and potentially for local government) of such property use.

Thank you

Kerry Burns  
Mob 0400 908 930

Eleanor March  
221 Warwick St, west nipaluna  
18th April 2022

Cap on new air B & B's.

Dear gentelperson - I would like to support the proposed cap on entire dwellings being repurposed as Air B & B's.

For 20 years I've shared my house with over 500 travellers as a WWOOF, Servus & HelpX host. It's been life giving, life changing; the currency involved isn't money, it's reciprocity and trust.

Reasons for objection.

1. Houses - places where people live - should not be exploited for profit. Both home ownership and rental affordability/availability are being blown out of the water by extortionate property prices driven by greedy investors; air B & B is one of the drivers
2. Air B & B erodes community. Where once there were neighbours, now there are passing strangers.
3. Too Tourism also destroys community: I feel reified and displaced in my own ~~city~~ city. ~~at~~ Hobart/Nipaluna is for the people who live and work here.
4. Climate crisis, and the imperative of drastically reducing our dependence on fossil fuels, by 2030, means that mass tourism - which guzzles fossil fuels - is wholly unsustainable.

Thank you! Happy autumn -

Eleanor

**From:** Nathan Volf <nathan.volf@gmail.com>  
**Sent:** Tuesday, 19 April 2022 3:13 PM  
**To:** Representation  
**Subject:** PSA-22-1 Amendment – Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To council, General manager and manager of city futures,

I am writing to support the amendment as it reads - The proposal is to amend the Use Table in each of the General Residential Zone, the Inner Residential Zone, and the Low Density Residential Zone to restrict the use 'Visitor Accommodation' - As a resident of HCC, I am deeply concerned regarding the recent increase of visitor accommodation particularly when they are encompassing of a whole dwelling.

The increase of Short stay visitor accommodation (SSVA) is furthering the already diminishing long term rental market and contributing to the rising cost of housing in the Hobart City Council area.

This decrease in housing stock created by SSVA is attributing to decreasing diversity in this great city, pushing out younger people, people who don't work or can't work full time and those who simply cannot afford the rising rental prices.

Restricting SSVA in HCC, is one tool that can be utilised by Council to support the increase of long term rentals and therefore the increasing of diversity in the city.

This amendment should also be expanded to cover the Sullivans cove planning scheme, as this amendment is too important to not include all areas of residence throughout the HCC area.

HCC does not need more hotels, it needs more homes, I ask that the council support this amendment and continue to utilise all tools at its disposal to stop more homes from being turned into SSVA.

Thank you for your time,  
yours respectfully,

Nathan Volf



**From:** Suzy Cooper <suzy@suzycooper.com.au>  
**Sent:** Tuesday, 19 April 2022 3:58 PM  
**To:** Representation  
**Subject:** Representation: PSA-22-1 Amendment – Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To the General Manager, Councillors, Manager City Futures and Acting Director City Life

I wish to make a representation in support of **PSA-22-1 Amendment – Short Stay Accommodation**

I think this is an excellent and well-reasoned response to a request from councillors, the community and organisations such as Shelter Tasmania. Many other progressive cities across the world are also responding to the same issue that's affect their communities and economies.

The amendment aligns strongly with the City's strategic plan, especially 6.1.1 through 6.1.9, in particular:

**6.1.5. Hobart's economy is strong diverse and resilient.**

**6.1.6. Hobart has a diverse supply of housing and affordable homes.**

We have sufficient hotel accommodation for visitors, which provides employment in a range of sectors. We should show our support for the business owners who've invested in those businesses and who employ many locals and support local businesses.

It's frustrating and frankly frightening, as a renter, to know there are so many entire homes being rented out as short-stay accommodation in my suburb while people I know struggle to find a home to rent. When they leave for outlying areas they take their businesses, their kids leave local schools, they sometimes stop contributing to clubs or volunteer roles and they stop shopping here. They take the life of the suburb with them. My community and all my local shops and businesses will benefit from having the steady custom of permanent residents.

Visitors come to a place to experience what life's like for locals. That's all lost when locals are priced out of the market and can't live or spend time in the city or surrounds - and the businesses they frequent die out because they can't be sustained in between tourist seasons.

Thanks for all your work in presenting such a well-reasoned and workable response to this challenging and multi-pronged problem that affects our community and the culture of our city.

I fully support the amendment.

Warm regards  
Suzy Cooper  
Gordon Avenue, Mount Stuart, Tasmania, 7000  
Ph 0439 933 274

**From:** Joanna Rosewell <office@jane.edu.au>  
**Sent:** Wednesday, 20 April 2022 2:07 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We run a college and outside semesters we rely heavily on short-stay accommodation for income over the breaks

all of the above!

loss of income which could result in possible staff termination

Regards,  
Joanna Rosewell

**From:** Mark Wilsdon <markrwilsdon@gmail.com>  
**Sent:** Wednesday, 20 April 2022 2:10 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I have over 30 years experience in the tourism and hospitality sector. In that time I have proudly seen Tasmania and Hobart develop to be the premier destination in Australia.

I am also a short stay host and offer facilities and a service to a broad sector of visitors who are looking for a unique and immersive experience.

Hobart experiences vibrant and growing tourism visitation. It is critical that a diverse offering is available to visitors to suit their individual aspirations and type of visit. Home sharing is an integral part of the tourism industry that delivers up to \$2.5 Billion per annum.

A ban on short stay accommodation in Hobart will dilute the diverse offering that Tasmania provides. This will also put jobs at risk and threaten the growth and sustainability of the visitor economy in Tasmania.

Regards,  
Mark Wilsdon

**From:** Catrina Kong <catrinakong16@gmail.com>  
**Sent:** Wednesday, 20 April 2022 2:06 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host because I love the experience of it, and it allows me to have friends and family stay at our holiday house while we're not using it. It allows for a lot of flexibility, which is important in my life.

I think that it's important for the tourism industry, as the only accommodation I use when I'm traveling is Airbnb. I think it's important for people who travel and want to have a 'home' style of accommodation, where they can cook their own meals and feel at home.

I think it'll negatively affect the tourism industry, as people traveling in groups may be less likely to want to stay in hotels (and pay for hotels) during their time in Hobart. I think it really narrows down the type of tourist or visitor that will come. I think it'll make the market overly competitive rather than a more-equal playing field

Regards,  
Catrina Kong

**From:** Simon Tamlyn <simonoliviati@bigpond.com>  
**Sent:** Wednesday, 20 April 2022 2:08 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We have a place on Bruny Island and it is as simple as we provide people the opportunity to visit the island due to the limited amount of accommodation.

I like a lot of families worldwide prefer to stay in Airbnb accommodation with children as most hotels only have a double bed option or the fees are exorbitant for a dual bedroom room.

I work in the tourism industry. This could have a profound impact (negatively) as people choose to

Regards,  
Simon Tamlyn

**From:** Erica Nathan <enathan3@bigpond.com>  
**Sent:** Thursday, 21 April 2022 11:14 AM  
**To:** Representation  
**Subject:** tourist accommodation reform

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This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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For the Planning Commission,

I'm writing in support of the initiative by the Hobart City to disallow single house dwellings to be used as holiday /Airbnb accommodation.

I live in an inner city suburb, Glebe, which is prone to this kind of use.

Our neighbour died a few years ago. His three bedroom house on a large block by Glebe standards was refashioned as an upmarket Airbnb towards the end of last year. Its bookings have been pretty solid. There have been a few noise issues but no incidents we have felt concerned about. There is just this soul-less in-out of the booked ghosts in what is a residential area.

This house could be lived in by people contributing to a sense of neighbourhood. Another near neighbour died a few months ago. We wait and see whether this will be another loss to our mini-community with its distinct geographical boundaries and with both formal and informal networks operating.

I don't know the figures around residential occupancy in Glebe but I do know that, as with other inner city suburbs, there already exists a high level of rental properties which can compound the impact of the short-term tourist properties. The longer term rentals are of course important and don't erode the sense of neighbourhood like the holiday rentals.

Unfortunately this amendment is too late for the house next to us. But we wait to see if this gutting of our suburb will continue. We hope not because the area will be an unattractive place to live. If we moved, our house might get added to the Airbnb list, and on it goes, another domino.

This proposed amendment is such a reasonable one.

Sincerely,  
Erica Nathan

**From:** Richie Cuskelly <richie.a.cuskelly@gmail.com>  
**Sent:** Thursday, 21 April 2022 2:37 PM  
**To:** Representation  
**Subject:** Representation - PSA-22-1 Amendment – Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear CEO,

I fully support this draft amendment for the reason's outlined in Council's report. It is fair and balances the need for greater sustainability, housing choice and affordability in the Greater Hobart region.

It will clearly:

- further the objectives of *LUPAA 1993*,
- not conflict with the (pretty irrelevant) State Policies, and
- support the principles of the STRLUS 2010-2035.

Kind regards,

Richard Cuskelly

3/18 Wallace Ave, Lenah Valley

**From:** Geoffrey Bradshaw <geoffrey.bradshaw@gmail.com>  
**Sent:** Thursday, 21 April 2022 4:39 PM  
**To:** Representation  
**Subject:** Support for Hobart City Council limiting the number of residential homes being turned into tourist accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I am a Hobart resident, living within the HCC area.

I applaud and strongly support the decision of the Hobart City Council to limit the number of residential homes being turned into tourist accommodation.

The rental housing supply crisis is very serious, and this decision of the HCC is likely to assist substantially.

I urged the Planning Commission to support and approve this reform.

Geoffrey Bradshaw

[geoffrey.bradshaw@gmail.com](mailto:geoffrey.bradshaw@gmail.com)

PO Box 350, South Hobart TAS 7004



**From:** Carrie Riseley <carrie.riseley@gmail.com>  
**Sent:** Friday, 22 April 2022 9:15 PM  
**To:** Representation  
**Subject:** representation about AirBnB planning rules change

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart and Tasmanian Planning Commission,

I wish to state that I am in favour of preventing any more entire homes from becoming short-stay accommodation in Hobart.

The housing crisis has become more and more awful in recent years. Seeing people visibly sleeping rough or begging on the streets used to be something that only happened in big cities like Melbourne or London. Now, you see them regularly in Hobart, even though we are a much smaller city and we should have enough places to house them all – and we do, it's just that so many are either left vacant by investors or rented out on AirBnb and similar platforms.

Then there are the tens of thousands more Hobartians who are not homeless but who are paying more than 50% of their income on rent. This both puts the possibility of buying their own homes even further out of reach, and limits the amount of money available for them to spend on other things like food and healthcare. In some cases it puts Tasmanian adults and children into situations of poverty – of not being able to afford enough of those most basic things. In other cases, it denies them the right to enjoy their lives the way that people who are not under housing stress can – through, for example, going to the cinema or going on holiday. Also, both looking for a rental property and living in one where rent is so high causes immense amounts of stress for people, which has a very negative impact on their mental health. As does homelessness for those who are homeless, of course.

There are a number of factors that have contributed to this crisis, including the unprecedented rise in house prices pushing more and more younger people to remain renting for longer – or sometimes forever – as a result of not being able to buy. Whole houses being let as short stay accommodation also contributes to this problem, as the lure of high profits draws more mainland and overseas investors to buy houses in Hobart in order to let them out as accommodation. This further increases demand for properties for sale, and thus makes it even harder and more expensive for the few locals who can still afford to buy them.

It's been said that the increase in international students in Hobart also contributed to the rental crisis, but I think that is less of an issue now because of covid. I don't wish to discount the possibility of that becoming a greater issue in the future, or to imply that AirBnB is the only cause of our housing crisis. There are multiple factors contributing to the rental crisis, but the fact that it had a significant reprieve, with rental prices and occupancy rates falling during the period Tasmania's border was closed due to covid, demonstrates that just a small amount of tweaking by our Council and our Government could be enough to ease the crisis. When a number of factors that place pressure on housing happen at once, the result is a crisis. We can't "fix" all of the factors, but preventing any more whole house short-stay accommodation permits from being issued will have enough of an impact to reduce homelessness and allow Hobartian renters the breathing space to afford all the medicine they need, to feed their families well, to enjoy good mental health and even be able to afford to go on holiday sometimes. We all have the right to health, housing and to enjoy our lives. Whole house short-stay accommodation premises are taking those rights away from some Tasmanians.

I am in my 30s and I own a unit in New Town, which I live in. I consider myself so incredibly lucky to be able to do that. So many of my generation – including many of my friends – have been unable to buy a property. My property is small and I cannot afford to "upgrade" as property prices have gone up even more in the four years since I bought it. In my generation, as a single person on an average wage, I am so lucky to have a property at all. It is really tragic and unjust that this is the situation now for anyone under 40.

I have absolutely nothing against people who rent out only part of their property on a short-stay platform. That helps many Tasmanians keep their bills paid and gives tourists a positive experience of being hosted by a local. It's also the reason why AirBnB was founded. AirBnB was never meant to be used for whole properties – it is for people to share either part of their home or a granny flat with visitors. I think it works very well for that purpose and have no wish to restrict it, only to prevent any more whole properties – i.e. properties where the owner does not live there – from becoming short stay accommodation.

I have used the term "any more" because the Council has decided rather than trying to restrict existing whole property AirBnBs, that they would only make this amendment apply to potential new ones. I presume they

decided this so that existing whole house short-stay accommodation owners would not feel attacked or have their existing businesses compromised. I think this is valid and I think it's important to keep existing property owners on side. So, I have no objection to the amendment applying only to potential future applications. However, I also have no objection to other measures being applied to existing whole house short stay accommodation places, for example higher rates being applied to such properties, as they are operating as businesses. If this encourages some owners of these premises to convert them back into rental properties, that would be good as it would further ease the rental crisis.

I hope that this amendment is passed by the Tasmanian Planning Commission and, further, that it is passed for other municipalities in Tasmania and Australia as well.

Yours sincerely,

Caroline Riseley  
5/62 Bellevue Pde  
New Town

**From:** Jenny Bugg <jenannbugg@gmail.com>  
**Sent:** Saturday, 23 April 2022 5:35 PM  
**To:** Representation  
**Subject:** Rental Houses to BNBs

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I hope you succeed with the Planning Commission on this move to limit homes being licensed for BNB.  
It is a no-brainer.

**From:** Chris <mtvic1@gmail.com>  
**Sent:** Monday, 25 April 2022 12:11 PM  
**To:** Representation  
**Subject:** Entire homes as short-term accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

I'd like to register my views on the subject of renting out entire homes for short-term accommodation.

While entities such as Airbnb provide a valuable and much-needed accommodation option, it's expanded to the extent that entire homes are being listed. The original idea was meant to be a spare bed or room for a night or two, and while these are still available (I have used quite a few such facilities), the current trend to let entire houses has become a problem.

It's all well and good to rent an entire home when towns and cities at busy times have full hotel, motel, caravan park etc occupancy. The situation now is compounded by the excessive cost of housing, the lack of affordable (indeed any) rental accommodation, and the long-term time frame to build more houses and units. A perfect storm of events as it were.

The simple solution as suggested by the Hobart City Council is a moratorium on new rentals of entire homes. I suggest it go further so that any entire home that is currently on the short-term accommodation list that is not rented for a certain period, say two, three or four weeks, be automatically dropped off the list. If the owner still wants income then they have to rent it out for a six-month minimum, just like any other rental property.

While we're on the subject, there are quite a lot of long-term unoccupied houses around. Anecdotally, many of these have been bought by interstate or foreign investors and then left empty in order to make a simple profit in the current booming market. Why aren't they tenanted? I suggest any habitable house that is empty for a designated period, say one or two months, that the owner has no intention of moving into or renting, has no renovation plan in place, has no reasonable excuse why it's vacant and is patently being left to rot, be compulsorily acquired by Council or the State for the price paid by the owner, and used as rental accommodation.

This will slow down the investment frenzy and free up much needed accommodation space.

Thank you,

Christopher Woods  
28 Lochner St  
West Hobart 7000

**From:** David O'Halloran <david.oh.ot@bigpond.com>  
**Sent:** Monday, 25 April 2022 2:57 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I fully support Hobart City Council's ban on new whole house lettings. This has had a terrible effect on Hobart's homelessness problem and all power to the Council.

Home SHARING is important. Taking whole houses out of the rental market is damaging.

The impact of the ban is that it might do something about Hobart's growing homelessness problem.

Regards,  
David O'Halloran

**From:** Mateo Palacio <m\_palaciogomez@outlook.com>  
**Sent:** Monday, 25 April 2022 2:58 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Airbnb has increased tourism and thus supported local businesses. I have met so many people and families that were able to travel to Tasmania thanks to Airbnb accommodations. If Airbnb is no longer an option, most people and families I know won't travel to Tasmania anymore, as the accommodation in hotels is very, very expensive and often is not even available. By banning Airbnb, you'll be destroying local tourism businesses and making it not possible for people to come to visit our beautiful island.

It will destroy many local businesses as it will not allow for many families and people to visit Tasmania, given the expensive and not available accommodation on most dates of the year. As a Tasmanian resident, business owner, events organiser and market organiser, this would affect the well-being of my family and mine dramatically.

Regards,  
Mateo Palacio

**From:** Samantha Lyndon <samantha@storiedhomes.com.au>  
**Sent:** Monday, 25 April 2022 2:59 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I have been a host for the past 4 years starting with the listing of my family's home. In 2020 I started managing properties on behalf of other owners and I now manage 15 properties 3 of which are in the Hobart City Council area

I know very well that at the moment there is no accommodation available in Hobart for Easter or Dark Mofo both of which are extremely important to the Hobart's economy especially Dark Mofo being in winter which is historically low season for Tasmania. Short-term accommodation options are essential for local businesses, events, and the broader tourism industry.

Restrictions on short-term accommodation will severely impact my business growth and my ability to support my family. Hobart is extremely popular with tourists and they simply won't be able to stay in the city if the accommodation is not available for them.

All of the homeowners I manage properties for live interstate. They won't put their properties on the long-term market as they use the properties themselves when visiting Hobart either as tourists or to be close to the family that lives here. These properties will sit vacant for the majority of the year if they are banned from being used as short-term accommodation.

Regards,  
Samantha Lyndon

**From:** Matthew McKenzie <matt@seesawstudio.com.au>  
**Sent:** Monday, 25 April 2022 3:28 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Hobart is our second home. We have a fantastic apartment that we get to use ourselves, and share it with other people that love it just as much. Our apartment provides something that Hotels simply can't offer, it provides an authentic experience for guests and allows them to feel at home, just like we do.

Without hosting our property through AirBNB it would remove not only our ability to visit Hobart so often, but also every other guest that has called our place home.

Hobart, like many great cities offer such a rich experience when travelling. Hobart is the type of place where you really need to feel like a local to get the best of it, the little nuances of the neighbourhood, the privacy and ability to be able to cook, relax and create memories in a house, not a single hotel room. This is so much bigger than the future guests though, this is vital to Hobart's tourism sector - one that has been destroyed over the past few years. A decision to overturn and change Home Sharing would be a disaster to the very fabric of Hobart and destroy the tourism sector and limit the choices visitors have. This helps no-one, only hurts.

This would be a HUGE step back for Hobart and create a ripple effect throughout hosting in other cities and the Tourism Industry as a whole. If this decision was made you are simply limiting people, you are limiting industries, you are limiting memories, you are limiting happiness and the pure joy that this pace of travel provides. For us personally it would change our relationship with Hobart, we would not be able to spend the time we do there, it would be a huge financial disadvantage and it would ultimately do the opposite of what you are trying to achieve in every sense. When you remove choice, when you limit peoples abilities and this would impact everyone. If there are housing problems you are trying to solve by doing this, this simply isn't the answer. The government has a duty to provide housing, to provide choice, to provide support, to provide options. It is not the responsibility of us or the 1,000s of other hosts to solve their problems. And it is certainly not the councils role to determine how i choose to inhabit my property.

Hobart needs to be a city for the future, not take steps backwards. Blaming an app and a platform that millions of people love is not the answer to whatever problem you are trying to solve, it will simply create more problems and take your city backwards.

Reconsider this proposal and do the right thing, for everyone.

Regards,  
Matthew McKenzie



**From:** Libby Oakes <oakeslibby@bmail.com>  
**Sent:** Monday, 25 April 2022 3:29 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host so that I can come to Hobart to see my family, to provide accommodation options to travellers as I have had a fantastic time using Airbnb in other states and countries and because I believe I have a right to use my property as I wish.

Tourism dollars benefit the broader community and I am supporting small business.

Flexibility and income will be impacted. Less opportunities for local creatives and businesses.

Please consider all opinions during the decision making process

Regards,  
Libby Oakes

**From:** Merrydith Callegari <merrical5@gmail.com>  
**Sent:** Monday, 25 April 2022 3:30 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I started hosting after I had to retire due to ill health. I host an apartment downstairs in our home and I've provided a personalised accommodation option for travellers to Tasmania who prefer to experience living in Hobart, rather than just visiting. I have welcomed many people from all walks of life. We are inclusive hosts and aim to make our guests feel like friends. From the reviews and letters we receive, we are doing just that. Hosting has given me a purpose as well as extra money that has enabled us to renovate our home and do some travelling we wouldn't have without our Airbnb listing. We buy from small Tasmanian businesses to stock our listing and we use gardeners and builders as well as laundry services, so what we earn goes out into our community and provides extra employment for our city.

I think hosting provides a unique accommodation style. Every place is different and there is usually something that suits even the most particular type of guest. It also shares the tourism dollar out into the suburbs and provides extra employment opportunities. Tasmania needs more accommodation beds and today's traveller requires options more than ever before.

Although my listing will not be affected by the changes HCC wants to make, I feel that those who want to host a whole home should be allowed to, because a ban on new whole homes will limit future availability of listings and that will impact tourism in this city.

Some listings will close over time and if others are not allowed to open the supply will decrease. I believe providing low cost housing options requires all levels of government to work together, not by banning one type of investment over another, but by encouraging investors to invest in long term rental and by providing incentives, not blame. Over the last 30 years government has dropped the ball and not provided new low cost rental opportunities. They have, instead relied on private investors, however these investors have been treated badly by renters and unless something changes in regard to landlord's rights, many will stop investing in the long term rental market completely. HCC needs to encourage innovative housing methods, allow a little more medium density to build up rental stock, and actually approve building permits.

Stop blaming one group of your ratepayers for a lack of houses, that is not their fault. Let's get building in Hobart instead.

Regards,  
Merrydith Callegari

**From:** Suzanne Solvyns <suzanne.solvyns@gmail.com>  
**Sent:** Tuesday, 26 April 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

My cottage in Hobart is our home away from home. My family and I love Tasmania and visit our own heritage cottage as much as we can. It is fully furnished and we would not be letting it out as a long term rental if we lost our short stay permit. I do have another property in West Hobart which is let out as a long term rental/investment property.

My cottage is located in Arthur Circus which is an iconic tourist spot to visit. I love my visits and love being able to share my 1848 cottage with others who really enjoy the experience. I also like to support the local cafes and restaurants which are just around the corner from my cottage. Also an easy walk to Salamanca markets so my guests are putting tourist dollars into local businesses.

I have a permit that I believe I am able to maintain but I think others in my situation, home away from home, should have the same opportunity and competition means better accommodation choices for our guests and a better experience for tourists coming to Hobart. It is certainly not a good option to have many cottages and houses that are used as family holiday homes unoccupied for long periods when families are not in residence. This encourages break ins. Using my family cottage as short stay accommodation when we are not in Hobart means also providing jobs for housekeeper, laundry, gardener etc. Many of these beautiful cottages and houses that are second residences will not get the same upkeep if left empty and not generating any income for maintenance. Removing our rights as owners is not the solution to the housing shortage and is a very short sighted attempt at a solution. Removing the land tax, even if only for long term rental properties, would be a much better solution to encourage investors who do not have this huge cost when investing in any other state of Australia.

Regards,  
Suzanne Solvyns

**From:** Graham Carter <grahamcarter@live.com.au>  
**Sent:** Tuesday, 26 April 2022 10:02 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I live outside of Hobart, and work part time as a nurse at the Royal Hobart. In order to do late / early shifts (where you finish work 10.30pm and start at 07.30am) I need to stay in Hobart. I also stay in Hobart after a night shift. It was becoming absurd to stay in motels as I was losing money. We stretched our finances to buy a little 1 bedroom cottage in Hobart. When I'm not there it helps to pay the mortgage to let it out. I feel blaming people like me for the problems in the housing and rental sectors is convenient finger pointing, and the government is being weak thinking banning short term rentals is the answer to a major social issue like unaffordable housing.

Travelers don't always want to stay in corporate style hotel/motels. Home share style accommodation has taken off and become a huge industry because it fills a gap. Tourism is the biggest source of income to Tasmania last time I checked, and reducing the choices of visitors will only harm the sector. I think the style of visitor who comes to Hobart in particular is suited to short stay non hotel/motel style accommodation.

We have a little one bedroom cottage that isn't going to solve the housing crisis, and as someone who trained to become a nurse later in life and doesn't have huge super, we could not afford to have this property without the rental support we receive from short term rental. I would have to further restrict the hours I work, as I wouldn't be able to do a lot of the late shifts and night shifts so I would lose on two fronts. I also imagine tourism would be massively affected; I imagine the big hotels would be thrilled though as they would get their 100% capacity back at the expense of people like me who are trying to pay their mortgage.

Regards,  
Graham Carter

**From:** Marius Engelbrecht <reservations@trinityhillapartmentsandco.com.au>  
**Sent:** Tuesday, 26 April 2022 10:03 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I started hosting 6 years again as a way to get income while looking after my baby twin girls. The jobs that I had would not allow for the time needed to look after the new twin babies whilst mom worked. So I started hosting which provided a second income while still allowing me to be a stay at home dad. Without this opportunity we would not have been able to make this choice of having time with the kids whilst they are still small.

There are many guests that I have hosted that do not want the plain white room and want to make their own meals, they choose to stay in other places than a hotel. It is their choice which you are now taking away from them. In my accommodation I provide suggestions of places that I enjoy going to and I promote the local area and businesses. Unlike hotels that just have a wall of leaflets for traveller to review take and through away to landfill. I read in the council report that by guests staying in other places than Hotels it has a greater environmental impact, well I would like to see where they get that from. In a hotel you have disposable toilet items, towel swaps daily etc. At a STA we promote to use the house like you would use your own. Provide refillable bathroom dispensing items, promote recycling and correct bin usage etc

As an example, you cannot get any accommodation in Hobart over the easter weekend of 2022, all hotels are booked, all STA are booked yet the council wants to put a ban on STA's in the Hobart area, great lets get all the tourists to head to the other councils and spend their money there. Banning STA is not going to solve the issue, it is more likely going to increase the problem as now my house will be more valuable than the next-door neighbour as I have council approval for STA.

If the HCC want to ban the use of standalone houses then it should be across the board for politicians buying houses for their officers, commercial ventures buying premises for hairdressers, lawyers doctors etc, they all use housing stock that could be long term rentals, but the HCC forget about these as they think that STA are the cause of the housing crisis instead of working with STA they seem to be totally against it. The HCC tends to forget the initiatives that certain STA companies do in providing free accommodation when there are troubled times like the bushfires, emergency service people. None of the hotels opened their doors.

As a person Who has worked hard and found that I enjoy hosting and the benefits it provides me and my family, I now have to give up my right, my choice, my investment so that the council can be seen as trying to help the housing crisis when instead they should be focused on approving plans for lowcost housing. You do not see the council dictate which shares to buy? Or what car to buy. Somewhere along the way the council has lost its direction and is trying to please the minority and loose a big majority of tourists and their money.

Regards,  
Marius Engelbrecht

**From:** Robert Grant <rob.grant@tasnetworks.com.au>  
**Sent:** Tuesday, 26 April 2022 4:46 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I Host guests as its helps me with my finance's. When I arrived in Hobart in 2005 from South Africa I was unable to find accommodation any where in Hobart to rent , short of staying in a Hotel, which was not affordable or Hostel, which was unsuitable for my age group. Nothing has changed in Hobart in 17 Years, accommodation is still very difficult to find. Hobart City Council are using Airbnb a their scape goat , as the council have not address the problem.

Airbnb makes it affordable for families and tourists to visit Hobart

I will find it difficult to pay my rates, water , power & Lights as this small additional income assists me .

Regards,  
Robert Grant

**From:** Amira Vaatstra <timandamira123@gmail.com>  
**Sent:** Tuesday, 26 April 2022 4:47 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We have been hosting since 2017 and do believe that the availability that we offer the market needs to still be on offer for potential guests that visit our state. Restricting options on visitor accommodation will hurt our tourism economy as a lack of options and availability will mean a lack of visitors. The rules proposed by the City of Hobart are the most restrictive in that nation and favours already established big hotel businesses - this is unfair to those mum and dad businesses hoping to make some extra income.

Allowing short stay accommodation means visitors have options for their stay and helps to boost the economy.

A lack of availability and options will mean fewer travellers to Hobart which in turn means an impact on our business and the broader Tasmanian economy.

Regards,  
Amira Vaatstra

**From:** Yvonne Buckley <yvonne.buckley@bigpond.com>  
**Sent:** Wednesday, 27 April 2022 4:18 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I have been hosting a 3 bedroom fully renovated townhouse in North Hobart very close Elizabeth St with its diverse offering of restaurants and the State Cinema and an easy walk to the city I host on AirBnB and have approximately 80% occupancy throughout the year. My clients are generally family groups visiting from intra and interstate. They seek this type of accommodation which is not generally available through other forms of visitor accommodation through fully furnished spacious indoor and outdoor living areas. This type of rental enables the property to be supervised and maintained to a high standard. The short stay accommodation offers flexibility so that family members can use the property for short stays as well.

Home sharing is a vital component of tourism accommodation in Hobart. Not only does it serve a niche market but supports local businesses. Most of my guests avail themselves of dining opportunities, State Cinema and wine bars. It clearly benefits the tourism industry as it caters for a unique market seeking that type of accommodation.

I would expect that there will be less properties available so this might result in greater demand for my property which is already at maximum occupancy. As a result, this may adversely affect the level of visitation to Hobart. Anecdotally, my guests specifically seek AirBNB accommodation in planning a visit to the state. If a ban was to be placed on my property, I believe I would seriously consider selling the property because it would no longer satisfy our expectations of the property when we purchased it. We regard it as a family business which requires a significant personal input but in turn offers a better return on investment than that of a long term rental property.

Regards,  
Yvonne Buckley



**From:** Catherine Dignam <cdignam12@gmail.com>  
**Sent:** Wednesday, 27 April 2022 4:19 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

My townhouse in South Hobart was purpose built as an Airbnb in 2017. This is my only property as I rent in Sydney, where I have work. This rental enables me to rent in Sydney and stay working as an older woman who needs and wants to work. My townhouse has never been lived in other than as an Airbnb. I do not see that I am depriving anyone of a home, rather allowing them to come to beautiful Tasmania and enjoy a gorgeous holiday in a beautiful place.

For example, the benefits it provides to local businesses in your neighbourhood and the broader tourism industry

I think local business benefits from Airbnb and as I have mentioned, my place was purpose built; never intended as a permanent home! I think the tourism industry in Tasmania is in significant need of good quality accommodation. I am not yet ready to live permanently in my house as I have good work in Sydney and as I need to support myself I will continue to work as long as I possibly can.

Regards,  
Catherine Dignam

**From:** Denise Booth <kdocwife@gmail.com>  
**Sent:** Wednesday, 27 April 2022 4:20 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I started using our cottage for short stay accommodation after 20 years of renting. After \$40,000 spent on repairs after this rental period we decided to use our cottage for short stay accommodation. I often have 4 people to stay which helps reduce their accommodation expenses and spend what they save on other things. Visitors are grateful to stay close to town as this allows them to walk and explore the surrounding neighbourhood. Our adult children who live on the mainland, have the use of the cottage when they visit as we live in rural southern midlands. We also use it on the odd occasion we want to head to town. I implore the Hobart City Council to reconsider this decision as it will dramatically affect the decisions visitors will make in considering their future travel plans. I have had many return visitors based on the location and easy access to the city. The other consequence of this decision could be the other major cities following suit and reducing our similar experiences when we travel. I would like to think that councillors are not being hypocritical in their judgment if they have had Airbnb experiences.

The guests that utilise the cottage use local shops to get supplies and are able to walk to nearby eating establishments.

I see tourists missing out on experiencing the vibrancy of the Hobart city. I will miss the revenue that assists me in maintaining the cottage.

Regards,  
Denise Booth

**From:** McIntosh <mcintoshpe@gmail.com>  
**Sent:** Wednesday, 27 April 2022 8:12 PM  
**To:** Representation  
**Subject:** PSA-22-1 Amendment - short stay accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To Hobart City Mayor and Councillors

### **Proposed amendments**

Peter McIntosh and Elise McIntosh support the Hobart City Council's proposed amendment to the Interim Planning Scheme 2015. We agree with the reasons for the proposed changes as listed under the headings "Environmental Considerations" 9.1-9.4, and under the heading "Social and Customer Considerations" 10.1-10.5. We add the following points for your attention

### **Vulnerable people**

In relation to Social and Customer Consideration 10.4, we note that in Hobart vulnerable people without security of tenure are particularly affected by the shortage of rental accommodation, and their plight is exacerbated by conversion of whole homes into short-stay accommodation. The article by Ben Bartl in the Mercury newspaper of Friday April 8th (see page 18) gives some statistics and is particularly relevant. For example, rents in the private rental market have increased by 45% in southern Tasmania over the past five years. Clearly some control is required to prevent investors squeezing needy families and individuals out of accommodation that is close to workplaces.

### **Commercial use in residential zones**

We are also concerned that the existing (uncontrolled) use of whole dwellings effectively converts streets (and potentially entire suburbs) presently classified as residential zones into commercial zones, by stealth. In residential areas long-term residents expect some community cohesion relating to knowing one's next-door neighbours, or parents having children at the same school as one's own children, or people who shop in the same shops. Conversion of houses to commercial accommodation has the potential to destroy such cohesion and the community spirit that goes with it. It is not a good planning principle to encourage or permit a commercial activity that isolates people in a residential zone rather than serving the community.

### **Financial instruments**

In addition to introducing a ban on future entire-dwelling short-stay accommodation, Council could consider applying commercial rates to already-approved dwellings used entirely for this purpose.

Peter and Elise McIntosh  
69 Lansdowne Crescent  
Hobart 7000

Phone: 6234 2372

**From:** Robin brien <robin.obrien@fire.tas.gov.au>  
**Sent:** Thursday, 28 April 2022 10:35 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Have a two bedroom cottage in Sandy bay, have been using it as a short term rental for six months. It has been a great success, with good returns and bookings. We have noticed that it's mainly booked by families and couples.

It injects cash where it is needed at the local family level. It's not going to international hotel chains. We also directly speak to our guests and give our favourite places to visit or eat at. Unlike tour buses and cruise ships which tightly restrict their customers spending at selected venues, we as air bnb host encourage visitors that spend more and across a wide range of local businesses.

The ban would see an immediate decline in tourism and associated spending. There would also be a shortage of accommodation available thus limiting tourist numbers. It would also limit what I can put back into the Tasmanian economy.

Regards,  
Robin brien

**From:** Teena Pescini <admin@aaretas.net.au>  
**Sent:** Thursday, 28 April 2022 10:36 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I do not host full time, it is more a hobby of mine and the option to let a space in my home if I am away to generate extra income. I have no intention of having a permanent person in my home full time so I would not rent a room to someone long term. This is a small injection of income into a family home and not a full time host. It should be an owners decision of what they wish to do with their home not be dictated to as what they can and can't do.

I believe it encourages more families to be able to travel and have a different type of holiday, enjoying a home that has facilities for your children or pets. These hosts offer a different alternative to a hotel room for people to stay in with their families. These people who host are generally not going to put someone in their home full time. I know I won't have someone rent a room full time.

Less people will come into Tasmanian which in turn will have less money spent in Hobart and surrounds, If I wanted a family holiday with my entire immediate family there is a couple fo homes in Hobart that could fit us all in. It would be the ultimate holiday to have everyone in one place together, it is not a one size fits all and not everyone wants to holiday in a hotel room.

Regards,  
Teena Pescini

**From:** Kerran Langley <lumierelodge@outlook.com.au>  
**Sent:** Thursday, 28 April 2022 10:37 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host because I take pride in creating a memorable and beautiful experience for guests. It is also a creative outlet for me outside of my job in Nursing. Lumière Lodge was one of the first experiential accommodations in Tasmania - I created the spaces and curated the experience based on what I perceived others would enjoy and because I thought Hobart needed something different. Lumière Lodge is our only home, but we choose to share it with others. We would not rent it if we could not share it, so we feel we are not putting pressure on the current housing pressures. Choosing to Airbnb our home has been a pleasure and has been well received. We hope that running this small business will help us towards another project, but until then it gives us some financial assistance through difficult financial times.

As a host I share my local knowledge with guests e.g. local and iconic eateries, where to shop local and I always purchase local produce for our guests too which increases their awareness of fine Tasmanian produce. It gives guests a feeling of what it is like to live local and appreciate what a beautiful place Tasmania is (other than a big city). We also provide information on bush walks, day trips and maps to help guests venture past the CBD. All of this assists our local economy.

I don't feel it is right - we have an ABN, we have tailored our only home to this purpose. Hosts should still have the right to apply for a permit in some way and for the purpose and home to be assessed. The problem will not go away. There will be an increased need for accommodation/housing with more skilled workers, migrants and Utas students moving into the city. The future numbers mentioned will out-way Hobart's capacity to assist this need for housing. There is also the shortage of resources to build - this issue may improve slightly, but it will be an issue for many years to come with this current climate.

I think this ban is 'reactive' and not thought out logically.

Regards,  
Kerran Langley

**From:** Brierlie Godfrey-Kemp <brierlie@gmail.com>  
**Sent:** Thursday, 28 April 2022 10:38 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Airbnb has allowed me to be a stay at home mum, looking after my children and providing income for my family. It has changed our lives for the better and to not allow whole house short term accommodation would be taking away my income and my ability to work from home.

Home sharing is great for Tasmanian tourism

A ban on short stay accommodation will ruin the tourism industry. I myself, always books home sharing accommodation for my family travels

Regards,  
Brierlie Godfrey-Kemp

**From:** Stewart Jackson <Stewart.Jackson@parliament.tas.gov.au> on behalf of Ella Haddad <Ella.Haddad@parliament.tas.gov.au>  
**Sent:** Thursday, 28 April 2022 2:47 PM  
**To:** Representation  
**Cc:** Ella Haddad  
**Subject:** Correspondence from Ella Haddad MP  
**Attachments:** Haddad\_HCC\_ShortStayAccom\_280422.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Councillors

Please find attached correspondence from Ella Haddad MP regarding the proposed amendments to the planning scheme to deal with short-stay accommodation.

Kind regards  
Stewart

**Stewart Jackson** he/him  
Electorate Officer for **Ella Haddad MP**  
**State Member for Clark**  
184 Collins Street, HOBART 7000  
Ph: 03 6212 2286 | [stewart.jackson@parliament.tas.gov.au](mailto:stewart.jackson@parliament.tas.gov.au)  
[www.ellahaddad.com](http://www.ellahaddad.com)



*I acknowledge the traditional owners of nipaluna, lutruwita the land on which I live and work.*

My days of work are Wednesday, Thursday and Friday.



# Ella Haddad

## Labor Member for Clark

City Planning Committee

Hobart City Council

Via email: [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

28 April 2022

Dear Councillors

On behalf of the Tasmanian Parliamentary Labor Party, I write to express support for the proposed amendments to the Hobart interim planning scheme to deal with short-stay accommodation and urge the Council to adopt them.

In early 2022, Tasmanian Labor called for a permanent pause on new 'whole dwelling' permits for short-stay accommodation, state-wide, recognising that every area of Tasmania now is an area of high rental stress.

The recently released Anglicare Rental Affordability Index shows the situation for renters in Tasmania is dire and getting worse. There are only 365 properties available for rent in the whole of Tasmania, most of which are unaffordable for people on low to middle incomes.

Tasmanian Labor will continue to call for state-wide regulation of the short-stay accommodation sector as one lever available to government to partly address the housing crisis.

We are disappointed that the Government continues to rule out tangible action in the short-stay accommodation sector and denies that the short-stay market has any effect on the private rental market.

This year, Hobart has recorded a rental vacancy rate three times worse than the national average and rent increases more than double the national average. Rental vacancy rates are less than one per cent state wide and meanwhile, thousands of Tasmanians are sleeping rough, couch surfing, staying in shelters or even sleeping in their cars.

In this context, Labor commends the City of Hobart for taking this action which will go some way to easing the housing shortage in the Hobart municipality. Meanwhile, Labor will continue to call on the Government to take urgent action to deliver the homes Tasmanians need and we urge all Councils to act in the absence of leadership from the Government.

Yours sincerely



Ella Haddad MP

Labor Member for Clark

Shadow Minister for Housing

- a: 184 Collins Street  
Hobart TAS 7000
- p: 6212 2286
- e: [ella.haddad@parliament.tas.gov.au](mailto:ella.haddad@parliament.tas.gov.au)
- f: [facebook.com/EllaHaddadMP](https://www.facebook.com/EllaHaddadMP)



**From:** Craig Godfrey <cgodfrey52@gmail.com>  
**Sent:** Friday, 29 April 2022 10:27 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I have been a part of AirBNB for five years now providing upmarket accomodation to tourists. Our guests reports speak for themselves, our Battery Point accomodation is a huge asset to beautiful Hobart. Another reason visitors crow about our historic city.

AirBNB is a time proven asset to Tasmania's tourism.

More than likely it would end with yet another property sitting empty. This is of no use to anyone, council included.

Regards,  
Craig Godfrey

**From:** Stephanie McKellar <steph.mckellar@outlook.com>  
**Sent:** Friday, 29 April 2022 10:28 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I use Airbnb to host when I am away from home to help to reduce costs of travelling.

I think home sharing provides a unique experience for visitors to get a feel for living in a city. In Hobart visitors come and spend their money locally. It is important to me to support local so I enjoy telling guests about my favourite spots.

An Airbnb ban will reduce availability of accommodation and will negatively impact tourism. Tasmania has been accused of being slow to keep up with the times and to enforce a ban will make travelling to Tassie more difficult to navigate. Tourists are accustomed to Airbnb as an accommodation option.

Personally this ban will limit my ability to travel to visit my family who live interstate as I rely on this income to assist me in offsetting travel costs as I often travel at peak times.

Please consider alternatives to a ban.

Regards,  
Stephanie McKellar

**From:** Leslie Scholfield <lcscholfield@gmail.com>  
**Sent:** Friday, 29 April 2022 10:28 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We host because it's what we have chosen to do with the property we own. Hobart and all of Tasmania are a jewel of Australian tourism but there is no question that travellers expect to have the short stay option and to take that way will not only hurt our family but also the Tasmanian economy and anyone in the community who benefits from those dollars. You will also be driving investment dollars and all the tax dollars that come it away from the State.

Shutting down short stay hosting will hurt Tasmanian families, workers, investors and visitors. Any consideration to ban or limit short stay rentals is a restriction of property owner rights and should be removed from the agenda immediately.

Regards,  
Leslie Scholfield

**From:** Phillip Wells <pewells@bigpond.net.au>  
**Sent:** Sunday, 1 May 2022 1:04 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Having been divorced I set up my property as a airbnb as part of my retirement plan. This allows me to live a reasonable modest lifestyle without requiring a pension from the government. I employ a cleaner, the services of a laundry mat, and from time to time maintenance workers. I also pay an accountant for financial services. I now live in St Helens but as I have a brother with a mental disability I travel to Hobart on a regular basis to see him. Airbning the house allows to me have somewhere to stay. If I were to rent the property this would not be possible nor could I live on the income. Years ago when there was a accomodation shortage Hobartians were asked to offer accomodations to travellers which with the help of airbnb we did. Now because the government has failed to build adequate affordable housing we are being penalised. It's time the HCC and the Tasmanian government took some of the blame for the situation we find ourselves in with rental housing shortages and started building more affordable housing. I note with interest the government has allowed UTAS to buy up many accommodation building in Hobart when they could have been used for low income housing. Indeed moving UTAS into the CBD shouldn't have happened. Wake up HCC and stop blaming airbnb. Should you wish to contact me my number is 0409185531. Kind regards, Phillip

Tourism is critical for our economy. Many cities and towns all over the world acknowledge the benefits of airbnb and short term stay accommodation. People moving to Hobart need to get use to the fact most rentals will be just outside of Hobart not in the centre. Why is the HCC pandering to the rental market instead of see much more benefits aspects of tourist accommodation.

If I should loose my airbnb in Hobart I will be forced out of retirement. After 40 years of education I don't have the energy to do this. I would then be forced to sell an asset that I wished to pass on to my children who being Hobartians will find it very hard to enter the housing market.

Regards,  
Phillip Wells

**From:** John Eymael <eymael@optusnet.com.au>  
**Sent:** Sunday, 1 May 2022 1:05 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I at times use a few rooms at my house for short stay accomodation. It provides a n income stream for me whilst I'm not able to work. If council proceeds to ban this I will probably have to sell and move away as

Many local retail business are supported by the short stay accomodation industry

Absolutely detrimental, I wouldn't be able to pay my council rates

Regards,  
John Eymael

**From:** Robyn Ross <sfcentre@iprimus.com.au>  
**Sent:** Sunday, 1 May 2022 1:06 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Our guests loved staying in our house. They were always respectful, quiet and we had so much positive feedback. Our guests did not want to stay in hotels or caravan parks. They often travelled with babies, small children and teenagers. They often travelled with grandparents and wanted a home away from home. Airbnb made it possible for families to holiday in our state, bringing in a lot of tourist dollars. Families like to cook their own food as well as eating out. These type of guests want a family holiday. There is not enough accommodation for families at a reasonable rate. If Airbnb is banned then we are missing out on this large tourist dollar. We always had great positive reviews. The guests were always respectful of our house a 100% better than most of our tenants. We turned our new house into an Airbnb because the last tenants caused \$25000 worth of damage. Tenants were never made responsible for their actions and with the bond and insurance we were still \$10000 out of pocket. We are hard working people and this just about broke us. We even had our property with real estate agents and they did not see the damage we had until the tenants had moved out.

I do not want to share my principle place of residence with guests.

A ban on short stay accommodation will isolate a lot of families from coming to Tasmania and this translates to a lot of tourist dollars. A lot of families can only travel when they can share accommodation as in renting a whole house like Airbnb.

Regards,  
Robyn Ross

**From:** Bryan Finlay <bfinlay@gmail.com>  
**Sent:** Sunday, 1 May 2022 1:32 PM  
**To:** Representation  
**Subject:** Objection to PSA-22-1 Amendment  
**Attachments:** Bryan Finlay Objection PSA221.doc

<table width=100%><td style="background-color:#FFF080; width:100%; border-style: solid; border-color:#E09A00; border-collapse: collapse; border-width:1pt; border-radius: 4px; padding:2pt; font-size:11pt; line-height:16pt; font-family:'Calibri'; color:Black; text-align: center;"><span style="color:#C04000;font-weight:bold;">CAUTION:</span><span style="color:#804000"> This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.</span></td> </table>

Please find attached my objection.

Bryan Finlay



Bryan Finlay  
8 Frost Street  
Snug, Tas. 7054  
Mob. 0409 450 189  
Email: [bjfinlay@gmail.com](mailto:bjfinlay@gmail.com)  
1 May 2022

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

Dear Chief Executive Officer,

**RE: Objection to PSA-22-1 Amendment – Short Stay Accommodation**

I wish to lodge an objection to the abovementioned amendment.

1. Notwithstanding this objection I support the objective of regulating the anti-social effects of Short Stay Accommodation (SSA) on the availability of long term rental accommodation (LTRA) for permanent residents. A more appropriate method of obtaining this objective will later be suggested in this document.
2. Whilst the amendment would prevent further diversion of LTRA to SSA it will do nothing to ameliorate the already desperate shortage of LTRA. The rental vacancy rate in Hobart for March 2022 was .3%. The situation is therefore dire for those needing LTRA. [www.domain.com.au/research/vacancy-rates-march-2022-1128965/](http://www.domain.com.au/research/vacancy-rates-march-2022-1128965/)
3. The amendment is a nonadjustable, inflexible method of dealing with a social problem which may require varying levels of intervention according to need over time.
4. An unfair effect will be the unwarranted enhancement of the already generally inflated value of housing for those who will be protected by their existing property use as SSA. An owner of an existing SSA property, without doing anything except contributing to the problem that the amendment seeks to address, will have an unfair privilege to continue SSA use which will increase the value of that property. This is contrary to planning objective 1(b) to provide for the fair, orderly and sustainable use and development of air, land and water; (see Tasmanian Planning Commission Act 1997; SCHEDULE 1 - Objectives of the resource management and planning system of Tasmania)
5. The amendment will eliminate an existing right of owners not presently providing SSA to utilise their properties as they see fit in accordance with the general norm of a residential use which does not infringe on neighbouring amenity. This is contrary to planning objective 1(b) to provide for the fair, orderly and sustainable use and development of air, land and water; (see Tasmanian Planning Commission Act 1997; SCHEDULE 1 - Objectives of the resource management and planning system of Tasmania)

6. There is considerable community concern to deal with the issue of housing availability and affordability in the context of Tasmanian Planning Policies. The amendment pre-empts such a State wide policy development. (See 5.2 of the Tasmanian Planning Policies – Report on draft TPP Scoping Consultation at [https://planningreform.tas.gov.au/\\_\\_data/assets/pdf\\_file/0003/656490/TPPs-Scoping-Consultation-Report.pdf](https://planningreform.tas.gov.au/__data/assets/pdf_file/0003/656490/TPPs-Scoping-Consultation-Report.pdf))
7. The amendment is contrary to the mandatory “permitted” requirement of 3.1(c) of the Planning Directive No. 6 – Exemption and Standards for Visitor Accommodation in Planning Schemes.
8. A much more finessed and fairer method of regulating the impacts of SSA on the LTRA market would be for Council to implement a charge for the permit required under the existing LPS. Such a charge could be adjusted from time to time to achieve the desired effect. Council has the powers to make such a charge pursuant to Sections 20, 73, 145, 168 and 205 of the Local Government Act 1993.
9. The level of the SSA permit charge could be calculated to encourage the availability of LTRA. A starting charge level, as a minimum, should reflect the enhanced annual rental value that a SSA property owner enjoys.
10. The proceeds of the SSA permit charges would be in addition to the normal property rates and could be applied by Council to the provision of affordable housing. This could be either by Council directly providing or by endowing an organisation dedicated to providing affordable housing.
11. It is submitted that the charge for a SSA permit as outlined above would be justified as a recovery of the social cost to the community. It is appropriate that those providing and enjoying SSA should be required to compensate the community for the social costs involved. This would be in conformity with planning objective 1(b) to provide for the fair, orderly and sustainable use and development of air, land and water; (see Tasmanian Planning Commission Act 1997; SCHEDULE 1 - Objectives of the resource management and planning system of Tasmania). SSA involves a social cost which the amendment would not appropriately address.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'B. Finlay', with a stylized, cursive script.

Bryan Finlay

**From:** Di Elliffe <di.elliffe@tutanota.com>  
**Sent:** Sunday, 1 May 2022 5:29 PM  
**To:** Representation  
**Subject:** Changes to planning scheme to restrict whole home short stay rentals

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I write to express my support for the Hobart City Council's request to the Planning Commission for changes in the area of short term rentals. I agree with the Council that it is time to rebalance the use of residential homes away from tourists and towards being available for rent by people who live and work in Hobart. There are way too many homes being put on AirBnB and Stayz when the owners could just as easily put them on the market for long term rental. Essential workers in the city are finding it very hard and expensive to find places to live in reasonable proximity to where they work.

I support the concept of the shared economy, and of homes being shared with visitors for short stays, but I do not support whole homes being made over to short term visitors over long periods of time.

Thankyou  
Di

Di Elliffe  
U601 The Commons Hobart  
126 Bathurst Street, Hobart  
*mob: +61 (0) 411671652*  
*web: <http://commonshobart.com.au/>*

**From:** Karen Clarkson <karen.clarkson@AOHTAS.ORG.AU>  
**Sent:** Monday, 2 May 2022 2:20 PM  
**To:** Representation  
**Subject:** Letter of Support for the Proposed Short Stay Accommodation Amendments  
**Attachments:** CatholicCare Tasmania - Letter of Support to Limit Short Stay Accommodation.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good Afternoon

Please see the attached letter from CatholicCare Chief Executive, Andrew Hill, in support of the proposed Short Stay accommodation amendments.

Kind Regards  
Karen



**Karen Thompson**

Governance Risk and Compliance Officer

CatholicCare Tasmania | 35 Tower Rd, New Town, TAS, 7008

Phone: 03 6278 1660 Mobile: 0407 417 000

[catholiccaretas.org.au](http://catholiccaretas.org.au) | [facebook](https://www.facebook.com/catholiccaretas)

Fostering a love for the poor and the vulnerable, a spirit of humble service, of mercy and compassion for all

*CatholicCare Tasmania acknowledges with respect the traditional custodians of Country in Tasmania, their elders past, present and emerging*

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By email to [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

2 May 2022

### **Representation from CatholicCare Tasmania to the Short Stay Accommodation – Proposed Amendments to the Hobart Interim Planning Scheme**

CatholicCare Tasmania is the primary social services agency of the Catholic Church in Tasmania, with a mission to foster a love for the poor and the vulnerable. Our services are available for people of all backgrounds, beliefs and circumstances. CatholicCare Tasmania deliver a diverse range of social services united by a shared commitment to improve the wellbeing of individuals, families and communities in need. At CatholicCare Tasmania, our focus is people.

### **CatholicCare Tasmania supports the Short Stay Accommodation- Proposed Amendments to the Hobart Interim Planning Scheme**

CatholicCare Tasmania supports this proposal to limit further increases to the number of entire homes used for short stay accommodation. In Hobart's current rental crisis, it is vital to prioritise the use of properties for long term rental homes for local people. Adopting the proposed recommendations will help to balance the use of residential properties for visitors and for people who live in Hobart.

This proposed amendment will enable the City of Hobart to limit new visitor accommodation involving entire dwellings in specified areas of Hobart. Importantly, they have no effect on existing short stay visitor accommodation, and will not affect people who are sharing their own home. The limitations apply only to entire investment properties being newly listed for visitor accommodation.

Renters in the Hobart LGA and across Tasmania are currently experiencing an entrenched crisis of affordability and availability.

- The density of short stay accommodation in Hobart is the highest of any capital city in Australia, and one of the highest in the world.
- Vacancy rates in Hobart's private rental market are persistently below 1%, when a sustainable vacancy rate is 2.5-3%.
- The December 2021 [Rental Affordability Index](#) showed that Hobart is still the least affordable capital in Australia.
- Even households on average incomes, including key workers such as nurses, teachers and officers in police and emergency services, are paying over 30%, and up to 80% of their income in rent.
- The December 2020 AHURI report [Marginal housing during COVID-19](#) shows the clear impact of short stay accommodation on Hobart's vacancy rates.

The need for social and affordable homes is increasing across Tasmania, and the waiting list for social housing in Tasmania is growing. As at February 2022, there were 4407 applications for social housing, and this number keeps going up.<sup>1</sup> Limiting the number of entire homes available for short stay accommodation is part of the solution to Tasmania's rental housing crisis, because every home counts.

Establishing this planning amendment in the Hobart LGA will enable other local governments to take similar action where high levels of entire home visitor accommodation are impacting the long term rental market.

In light of the detrimental impact that short stay accommodation has had on the availability of long term rental properties, CatholicCare Tasmania supports the proposal to limit any increase to the number of entire homes used for short stay accommodation that could otherwise be used by local people to rent long term.

For further information, please contact

Andrew Hill  
Chief Executive, CatholicCare Tasmania  
[Andrew.Hill@AOHTas.org.au](mailto:Andrew.Hill@AOHTas.org.au)

---

<sup>1</sup> [https://www.communities.tas.gov.au/housing/tasmanian\\_affordable\\_housing\\_strategy/reporting](https://www.communities.tas.gov.au/housing/tasmanian_affordable_housing_strategy/reporting)

**From:** Rachel Vermey <rachel@vermeys.com.au>  
**Sent:** Tuesday, 3 May 2022 3:18 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We purchased a property close to our home so that my elderly mother (a long term pensioner with significant health issues) could move closer to us but live independently, when she needs more support. Airbnb allows us the flexibility to host until such time as she can no longer live in her current rental.

Without Airbnb, there would not be sufficient short term accommodation for families. We love that many of our guests stay with us because they have family that live in the area and want to stay close to them ... adults children coming to care for sick relatives, grandparents coming to spend time with grandchildren & have the scope for grandchildren to stay for sleepovers. We have also had several families that live remotely in Tasmania, but need to stay close to the RHH before stay with us before & after giving birth for medical reasons. They have loved that they can stay as a whole family.

Banning short stay accommodation will negatively impact on tourism and family travel.

Banning Airbnb in Hobart will not result in more affordable accommodation on the rental market, unless there are current Airbnb owners happy to rent at a loss. If the HCC really wants to make an impact on affordable accommodation, they should give incentives to owners to rent by cutting HCC rates (lower landlord costs also means lower costs to recoup = lower rents), they should encourage development of new affordable housing and consider the amount of property 'locked out' for housing developments, by Tas Uni sitting on so many properties in the Hobart City Centre.

Regards,  
Rachel Vermey

**From:** Bill Tsourdalakis <btsourdalakis@gmail.com>  
**Sent:** Tuesday, 3 May 2022 3:19 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We are hosting our property so it can be of use to others whilst we are not there. We do not reside in Hobart permanently but we have a unique property that appeals to many guests.

My property is in a suburban area 10-15 minutes outside of Hobart that I believe would have little exposure to outside guests. It is assist local business with increased patronage and further spreads the word about how amazing Tasmania and Hobart is to stay. I do not believe that Hobart would have enough rooms without Short term stays to accommodate all the guests who come to Hobart.

I believe the impact on tourism in Hobart would be significant in a negative way. Especially for families where hotel accommodation is very expensive and not ideal. For me personally we may have to consider our investment in Hobart and look to pull out. I believe many investors would be in the same boat, which would impact property values.

Regards,  
Bill Tsourdalakis



**From:** Sarah Glover <sarah@bondibikkies.com>  
**Sent:** Tuesday, 3 May 2022 3:20 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Hosting my property on Airbnb has benighted my family greatly, especially due to loss of income from cover 19. This has saved our finances and family from great loss. I love airbnb and want to continue using this platform

Its so important to local business, Tourisum and to our neighbourhood, its has been of great value to

it will devastate our family and ability to live. This will greatly effect Tourisum as it will leave a massive hole in the economy for people to experience what Tasmania is about and that is authentic and warm communities

Regards,  
Sarah Glover

**From:** Camilla Davenport <millydav@tpg.com.au>  
**Sent:** Tuesday, 3 May 2022 3:21 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We have been able to share our beautiful and unique house next to a church in South Hobart. We offer the whole house to guests when we are not there ourselves. Sharing our house to guests has meant we able to share the beauty of South Hobart with guests from all over Australia and the world. The history of the house itself has been shared with guests along with the history of the suburb. Hosting our house has been such a positive experience for our family and has meant we are able to preserve the history of the house.

Sharing our house with guests has promoted the history of Hobart. It has enabled local businesses in South Hobart to benefit from increased economic input, greater exposure of businesses and services in the area and greater Hobart. Home sharing has provide an economic injection into the local neighbourhood and greater Hobart via tourism dollars, increased use of local services and an increased economic injection into the tourism industry if greater Tasmania.

The ban will kill the tourism industry in Hobart. Without affordable, practical and adaptable accomodation in Hobart tourism will suffer greatly. As a family a ban on short term stay will mean as a family we will suffer greatly economically. We are reliant on the short term rental market to pay our mortgage. A ban on short term rentals in Hi art will have a devastating impact financially on multiple industries.

Regards,  
Camilla Davenport

**From:** Ruth Malcolm <ruth@wolfproperty.com.au>  
**Sent:** Tuesday, 3 May 2022 3:22 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Air bnb is a great way to supplement retirement and top up your pension

The people requiring housing do not living in inner city Hobart. The goverment has failed in providing social housing. BnB guests spend a huge amount locally. This should not fall back on private owners to provide social housing.

Huge, no competition, price gouging. I'm sure this is illegal and will create cartel conduct

Regards,  
Ruth Malcolm

**From:** Brittany Trubody <btrubody@hotmail.com>  
**Sent:** Thursday, 5 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

My family is in Hobart, but I live and work on the NW coast. I come down to take care of my mother who is on her own since dad died. Several years ago, we bought an apartment to stay in while we were in Hobart as it was costing us many thousands of dollars to stay in hotels when seeing family (more so at Christmas and holidays). We still stay in this apartment when we visit mum, but when we aren't there, it is let out to others to help pay the mortgage. My colleagues stay when coming down from the NW and friends who have hospital treatment at the Royal. I understand the want on restricting Airbnb's but as I need my place to stay when seeing mum, it would have to remain empty as I would not want to ask someone to move out every once a month for my 3-4 day visit. I have long term rental properties here in the NW and they are leased to low income earners only (my choice) I have not put the rent up and don't plan on it (one of my tenants is 82). But if I need help covering my empty apartment in Hobart, I will unwillingly need to put it. I do not want too, I do not need too. But if I am being made to choose, regrettably family will always comes first.

We have a lot of temporary workers ie. hospital specialists, doctors and nurses. It is a no-brainer that these resources are vital to our community and as they use my place, they are buying groceries and getting to know the region in a home environment. I'd like to think that they could then see themselves living in their own place long term

I'm not going to stop seeing my family, I'm not going to ask a long term tenant to move out once a month so I can stay. So this means that I would increase the rent of my permanent tenants to cover my costs for my Hobart apartment.

Regards,  
Brittany Trubody

**From:** Phil Schubert <phil.schubert@gmail.com>  
**Sent:** Thursday, 5 May 2022 10:02 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We own a business in Hobart but also live in the state. We bought a place in Hobart so that we would have somewhere to stay when working there, usually a fortnight on and a fortnight off. While we are away, instead of our one bedroom flat sitting empty, we have it on Airbnb and this means that holidaymakers and others including Tasmanians accessing health care at RHH also can stay. If Short stays are banned then our place will sit empty while ever we aren't there.

We have a cleaner who attends after us and each guest and also use a local linen service. If we can't rent the property out anymore then these people won't have that employment.

While it is true that this property could be used for long-term rental tenants, that then defeats the purpose of us having a Hobart base while we are working in the city. Accordingly we do not support the proposal to ban short stays in the Sullivans Cove development area. This will be retrograde step for the recovery of the local tourist economy and even in our small example it is obvious such a move would have flow on effects. Short-stay rentals in Hobart are not some great investors' delight and certainly in our case is a way that we can put the property to good use when it would otherwise be sitting empty.

Regards,  
Phil Schubert

**From:** Jessie Fletcher <mcmillan.jessie@gmail.com>  
**Sent:** Thursday, 5 May 2022 10:03 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We recently purchased a house in hobart to offer on the Airbnb market. It has just been made available to rent. We bought a house because when we come to Tassie to visit family it has been hard to secure accommodation. We have since bought a second property that we intend to Airbnb and some stage in the future.

There is never enough accommodation in hobart. Airbnb take some of the overflow. Also it offers a very different style of accommodation for families

The tourism industry will be missing a massive section of accommodation that is available EVERYWHERE else! This will impact our family through a loss of income. We bought our properties with the intention of renting them short term.

Regards,  
Jessie Fletcher

**From:** Robyn Wellock <werndee@internode.on.net>  
**Sent:** Thursday, 5 May 2022 10:04 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We have an historical home of much significance in Hobart's history. We consider the origin of Airbnb is of crucial importance in its impact on our city, in that it is about sharing your property and the local lore. It is NOT about renting out your shack in a coastal resort or buying up housing to make money short term letting to tourists at the expense of housing for locals . So , I agree with the Council's plan to disallow whole house renting on Airbnb. They are NOT , as far as I understand it , stopping people from letting a unit or room in your house and sharing stories with guests from near and far.

The Council is not trying to ban home "sharing" , remembering that Airbnb started as an air mattress on a floor of a friend of a friend's house. Sure tourists eat out a lot and give new life to recreational businesses and obviously help fund the tourism industry.

There IS NO ban on short stay accommodation. Only on people profiteering from tourists with no concomitant sharing of recommendations or local lore.

NB the responses are generated from prompts from the Airbnb group.

Regards,  
Robyn Wellock

**From:** Kirrili Edwards <kez.edwards@gmail.com>  
**Sent:** Thursday, 5 May 2022 10:05 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I am a host in Hobart greater region. I offer accommodation to guests for two reasons: 1) Guests live the 'home away from home' experience. Tourism also benefits the Tasmanian economy. I am a single retired female with very little other income. My extra income from the AirBnB also benefits the Tasmanian economy. It would indeed prove an enormous error to remove the service provided by AirBnB Hosts across the broader Tasmanian community

For example, the benefits it provides to local businesses in your neighbourhood and the broader tourism industry

What impact will the ban have on you and your family?

Regards,  
Kirrili Edwards



**From:** Cindy Hart <cindyhart@live.com.au>  
**Sent:** Thursday, 5 May 2022 12:43 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I have just started hosting great way to meet new people and inform them of the attractions of Tasmania

Yes very important that my home can be shared by anyone on one of the best beaches near Hobart

Impact of lower income which helps with the higher cost of living

Regards,  
Cindy Hart

**From:** Kristen Moane <dunesonc@gmail.com>  
**Sent:** Thursday, 5 May 2022 12:44 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I live on a farm that is zoned primary production/tourism as preferred use. I renovated a cottage for farm stay tourism accommodation as the property is perfectly positioned to suit tourists in terms of proximity to the airport and tourist attractions. I also consider myself an advocate and educator for tourists about Tasmania and it's unique wildlife and fauna. It also allows me to contribute directly to my local community and economy.

We are locals but also advocates for Tasmania we contribute directly to our local state and council economy

It is a direct punishment and barrier to locals participating in benefiting our own local economy and tourism industry

Regards,  
Kristen Moane

**From:** Andrew Barrow <andrew\_jbarrow@hotmail.com>  
**Sent:** Thursday, 5 May 2022 12:45 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I live in Hobart for half the year. It's really convenient to have people stay in our home and feel just as at home as I do in the city.

Hobart is a people city. People like to live like locals and airbnb style accommodation helps make that feel more real.

I'm sure less people will travel to hobart for events such as dark mofo if airbnb is banned.

Regards,  
Andrew Barrow

**From:** Jennifer Williams <jwilliams49@bigpond.com>  
**Sent:** Thursday, 5 May 2022 12:46 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

The decision to operate my cottage as short term accommodation benefits our family in that we are able to also use the property for family members returning from overseas and interstate. It also allows tourists to enjoy staying in accommodation other than a hotel room which is often reflected in the favourable comments made when guests check out! I might suggest that maybe some Hotels with self contained facilities might also be approached to offer some of their suites for longer term accommodation to relieve the current shortage rather than concentrating on depleting our unique tourist market!

As mentioned, it is important for travellers to Hobart to be able to enjoy a variety of accommodation options rather than Hotel suites. Getting out in the suburbs assists all local eating establishments and attractions!

I would not have the flexibility of use of the property by my family returning from

Regards,  
Jennifer Williams

**From:** Michelle La Roche <michelle@littlecitygroup.com.au>  
**Sent:** Thursday, 5 May 2022 12:46 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

To share my property with friends, family and visitors to the state when I am not using it.

It's good for tourism, it benefits local business, it gives families a place to stay, it adds diversity to the accommodation landscape of Tasmania. Banning home sharing is a very backward step for Hobart in terms of progression.

As per previous response. This is a ridiculous knee-jerk reaction to a problem which won't be solved as a result of the ban.

Regards,  
Michelle La Roche

**From:** Christopher Baker <watchdog@baker.sx>  
**Sent:** Thursday, 5 May 2022 12:47 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I Airbnb my home when I'm not in it. Rather than sitting there doing nothing I short term rent it as I can not do long term as I'm in and out every few weeks. I also have another unit close to the hospital that my parents use as my father comes to Hobart for regular medical treatment, when he is not scheduled for treatment I also short term rent it. I can not do a long term lease on these properties as I need to use them when I need them. As I can not do long term rental I do short term to help cover the costs.

Stopping short stay will make me homeless as I will not be able to afford a place in Hobart to visit my children when I come home from work. Also my father will not be able to afford to come to Hobart to get the medical attention he requires.

I feel sorry for the people who can find accommodation. But don't make me one of those people and don't put my father's health at risk.

My properties are in no position to be long term rented out. So why say no to short term?

Regards,  
Christopher Baker

**From:** Antonia OBrien <antoniakent@hotmail.com>  
**Sent:** Thursday, 5 May 2022 12:48 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I am a short stay host and also a landlord. I work hard to keep my tenants in a safe and high standard housing. By making a higher amount from short stay I am able to afford more upkeep on property and, I am safeguarding my children and my future by not burdening Government benefits-I also enjoy the host experience immensely. The one short stay I do own is hard work, guests contribute significantly to the local economy and to maintain a high short stay standard takes a lot of time and money. By taking aim at short stay, the HCC is absolving the state government from their responsibility to provide social housing. This is their responsibility-not mine. The liberals are selling off social housing but not rebuilding. This is a short term, small minded agenda from the HCC for a much larger issue

The local economy benefits significantly. I see where guests have shopped, eaten and ridden (The E scooters!) . For years Tasmanian has been plugging itself to the world to try and lure tourists but now we don't have room to house them! I provide a short stay house, create memories of tasmania, meet others from around the world and country and this is now viewed as negative? It is not my responsibility to provide social housing.

A ban on short stay will have a number of negative impacts both future and imminent. Often families will benefit financially to allow money to be put to areas they otherwise may not afford. I am not greedy, I have a social conscience and I am also future proofing my family, financially. For us-it is maintaining a heritage house which would not be maintained but for this income stream. I am not running a night club in suburbia, but being allowed to maintain a very high standard of accommodation for families. Without short stay, tasmania will see a decline of longer term visitors, events such as dark mofo will be impacted by lack of accommodation. The HCC has allowed Utas to buy hotels in hobart and convert to student accommodation. So what are the hotels rooms being replaced with? Do we want tourists or not? I urge the HCC to look long term and lobby the government for social housing, review the Utas move-convert some of their current hotel rooms to housing and leave the local ratepayers to do the best they can in these hard times.  
So disappointing.

Regards,  
Antonia OBrien

**From:** Charlie Burton <Charlie@tascoss.org.au>  
**Sent:** Thursday, 5 May 2022 2:37 PM  
**To:** Representation  
**Subject:** TasCOSS Submission Short Stay Accommodation - Proposed Amendments to the Hobart Interim Planning Scheme May 2022  
**Attachments:** TasCOSS Submission Short Stay Accommodation - Proposed Amendments to the Hobart Interim Planning Scheme May 2022.docx

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello

Attached is TasCOSS' submission to the Short Stay Accommodation - Proposed Amendments to the Hobart Interim Planning Scheme consultation.

Please let me know if you have any questions.

Kind regards,

Charlie



**Dr Charlie Burton**

Manager Policy | TasCOSS

He/him

Tasmanian Council of Social Service Inc  
Level 3, 86 Murray Street, Hobart, TAS, 7000  
GPO Box 771, Hobart, TAS, 7001  
p (03) 6169 9514 | m 0402 016 625  
e [charlie@tascoss.org.au](mailto:charlie@tascoss.org.au) | w [tascoss.org.au](http://tascoss.org.au)



I acknowledge that I live and work on Aboriginal land, land of the palawa/pakana people of lutruwita (Tasmania). I pay my respects to the Tasmanian Aboriginal Community, to elders past and present, and to all who continue caring for country, sharing stories and upholding rights.





Tasmanian Council of Social Service Inc.

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# Short Stay Accommodation - Proposed Amendments to the Hobart Interim Planning Scheme

*May 2022*



INTEGRITY  
COMPASSION  
INFLUENCE

## About TasCOSS

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TasCOSS's vision is for one Tasmania, free of poverty and inequality where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry in Tasmania; and to challenge and change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

Please direct any enquiries about this submission to:

Adrienne Picone

Chief Executive Officer

*Phone Number:* (03) 6231 0755

*Email Address:* [adrienne@tascoss.org.au](mailto:adrienne@tascoss.org.au)

## Introduction

TasCOSS welcomes the opportunity to make a submission on the amendment to the Hobart Interim Planning Scheme 2015. Housing is a human right, but rents are rising so thousands of Tasmanians are experiencing housing financial stress, forcing them to choose between a roof over their heads and paying for other essentials such as food and healthcare as well as leading to tenuous tenancies. At the same time the wait list for public housing is growing and specialist homelessness support services are unable to meet increasing numbers of requests for help.<sup>1</sup>

In such a tight market, every home counts. TasCOSS therefore supports the amendment to the Hobart City Council Interim Planning Scheme proposed by Hobart City Council to limit new visitor accommodation involving entire dwellings in specified areas of Hobart.<sup>2</sup> Importantly, the changes would have no effect on existing short stay visitor accommodation, and will not affect people who are sharing their own home. The changes apply only to entire investment properties being newly listed for visitor accommodation and so are a limited and reasonable restriction on the uses to which individual properties might be put.

## Key Issues

Australia's housing system is complex, partly due to all three levels of government having some role in the system, and the current housing crisis has multiple drivers including population growth, changing housing need, a retirement income system built upon homeownership, and tax concessions that reward investment in housing as an income- and wealth-generator instead of as essential social infrastructure that provides the foundation for a good life. In this context we need to look at every lever, in every level of government, to give every chance for all Tasmanians to have an affordable and stable roof over their heads.

That is why in recent years TasCOSS, along with Tasmania's housing and homelessness peak body Shelter Tasmania and a wide range of other organisations, have argued for the need to place restrictions on short stay accommodation particularly in areas of the state with low rental vacancy rates and high demand for affordable housing. As the level of government closest to communities, we believe councils are well placed to assess and respond to key social and economic challenges in their local government areas.

Take for example the Hobart local government area, which is experiencing an entrenched crisis of affordability and availability:

- The density of short stay accommodation in Hobart is the highest of any capital city in Australia, and one of the highest in the world.<sup>3</sup>
- Vacancy rates in Hobart's private rental market are persistently below 1%, when a sustainable vacancy rate is 2.5-3%.

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<sup>1</sup> [Communities Tasmania - Reporting; ST FACT-SHEET Homelessness-updatedJune2021.pdf \(sheltertas.org.au\)](#)

<sup>2</sup> [SKM\\_C360i22032916020 \(hobartcity.com.au\)](#)

<sup>3</sup> Peter Phibbs, presentation to Hobart City Council, 4 December 2021

- The December 2021 [Rental Affordability Index](#) showed that Hobart is still the least affordable capital in Australia.
- The December 2020 AHURI report [Marginal housing during COVID-19](#) shows the clear impact of short stay accommodation on Hobart's vacancy rates.

Hobart and indeed Tasmania is not the first to place restrictions on short stay accommodation to prioritise affordable housing for residents and there are already controls on visitor accommodation in Battery Point, the Wapping area of Sullivans Cove and on Flinders Island.<sup>4</sup> Many other cities around the world have introduced various restrictions including caps on visitor nights, banning whole home listings, using zoning laws to prohibit short stay activity in certain areas, as well as taxes and fees designed to reduce short stay activity, with growing evidence that regulatory interventions are effective.<sup>5</sup>

As well as likely adding to the supply of private rental properties, there is evidence that this can also result in lower rents. A 2021 analysis of the impact of short stay accommodation on rents in Tasmania conducted by housing researcher Dr Peter Phibbs suggests a direct relationship between a reduction of short stay accommodation and a decrease in rent, presumably because the short stay properties were added to the longer term rental market, adding to supply and thereby putting downward pressure on prices.<sup>6</sup> This echoes research by the Reserve Bank of Australia that the dominant influence on real rents is the vacancy rate.<sup>7</sup>

The dire need for housing is Tasmania-wide and TasCOSS hopes that by establishing this planning amendment in the Hobart LGA, other local governments will take similar action where high levels of entire home visitor accommodation are impacting the long term rental market both in terms of supply and rising rents.

## Conclusion

The impact of rising house prices, demand outstripping supply for private rentals as well as social housing, and rising cost of living pressures means life is increasingly precarious for thousands of Tasmanians. We need to do all we can to ease these pressures, starting with ensuring all Tasmanians have a safe and affordable place to live. One small lever at our disposal – restricting the number of whole homes being transferred from the private rental market to the short stay accommodation sector – is a limited and reasonable response to what is a crisis for an increasing number of Tasmanians. Every home counts.

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<sup>4</sup> [Planning-Directive-No.6-Exemption-and-Standards-for-Visitor-Accommodation-in-Planning-Schemes-as-modified-1-August-2018.pdf \(planningreform.tas.gov.au\)](#)

<sup>5</sup> [UTAS-ISC-Insight-Eight-Regulating-Short-Stay-Accommodation.pdf](#) pp.8-10.

<sup>6</sup> Peter Phibbs, presentation to Hobart City Council, 4 December 2021

<sup>7</sup> [A Model of the Australian Housing Market \(rba.gov.au\)](#), p. 17

**From:** Vertigan, Craig <Craig.Vertigan@nre.tas.gov.au>  
**Sent:** Thursday, 5 May 2022 3:49 PM  
**To:** Representation  
**Subject:** Feedback to open on short-stay amendment

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I have read plenty of articles by housing experts that clearly prove that short stay accommodation has had a detrimental effect on availability of long term rentals. We have been in a housing crisis for a number of years now and something needs to be done.

So I therefore approve of the amendment to insert a new qualification of 'visitor accommodation'. I also approve of charging extra rates to these operators, since they are essentially running a commercial operation like a hotel. If hotels are charged commercial rates then so should these AirBnB operators.

Regards  
Craig

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**Craig Vertigan**  
6165 4467  
Lead Software Developer  
Business Software Development & Support  
Information Services Branch,  
Natural Resources and Environment  
Level 8, Lands Building

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**From:** Richard Eccleston <richard.eccleston@utas.edu.au>  
**Sent:** Thursday, 5 May 2022 4:11 PM  
**To:** Representation  
**Cc:** Megan Langridge; Sarah Hyslop  
**Subject:** Representation in support of the proposed PSA-22-1 short-stay accommodation amendment.  
**Attachments:** TPE short stay accommodation submission\_final.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Ms Grigsby,

On behalf of the Housing and Community Research Unit (HACRU) and the Tasmanian Policy Exchange (TPE) at the University of Tasmania, we are making the attached representation in support of the proposed PSA-22-1 short-stay accommodation amendment.

Having conducted detailed and nationally recognised research on the impact and regulation of short-stay accommodation in Tasmania since 2018, we argue that this is a pragmatic and evidence-based policy response that will make a difference to Tasmania's ongoing housing crisis. We first proposed that restrictions be placed on the issuance of entire home short-stay accommodation permits in 2018 and, given that private long-term rental supply and housing affordability have continued to deteriorate since then, we believe it is still an appropriate response.

Naturally we are happy to discuss the representation if you have any further questions.

Kind regards,

Richard Eccleston on behalf of HACRU and the Tasmanian Policy Exchange

**Professor Richard Eccleston**

Director, Tasmanian Policy Exchange  
University of Tasmania  
Sandy Bay TAS 7005  
M +61 435002764  
T +61 3 6226 2896  
[www.utas.edu.au/tpe](http://www.utas.edu.au/tpe)  
[Richard.Eccleston@utas.edu.au](mailto:Richard.Eccleston@utas.edu.au)

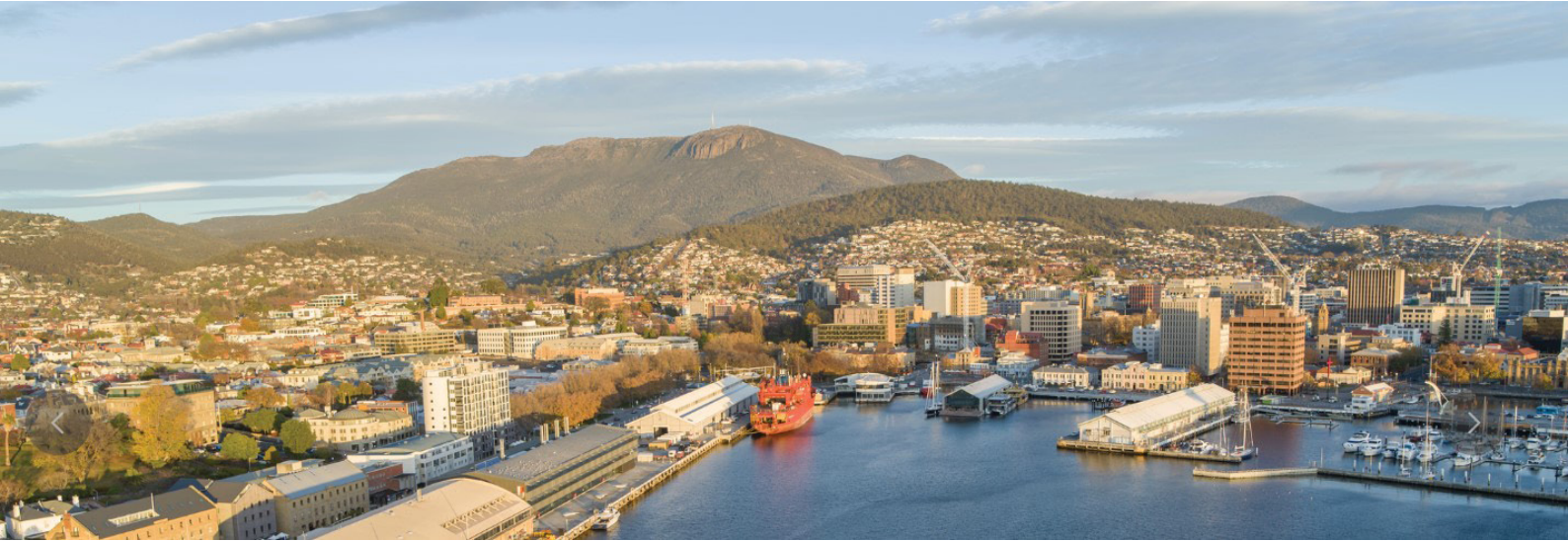
**Our latest policy analysis:**

[Options for a climate-positive Tasmania](#) (November 2021)  
[Covid-19 and the future of work in Tasmania](#) (August 2021)



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# **The regulation of short stay accommodation in the City of Hobart**

**A representation in support  
of the proposed PSA-22-1  
amendment**

Prepared by the  
**Housing and Community Research Unit (HACRU)**  
and the  
**Tasmanian Policy Exchange (TPE)**

6 May 2022



## **ACKNOWLEDGEMENT OF COUNTRY**

The University of Tasmania pays its respects to elders past and present, and to the Tasmanian Aboriginal community that continues to care for Country. We acknowledge the profound effect of colonial settlement on this Country and seek to work alongside Tasmanian Aboriginal communities, respecting their deep wisdom and knowledge as we do so.

The palawa/pakana people belong to one of the world's oldest living cultures, continually resident on this Country for at least 40,000 years. We acknowledge this history with deep respect, along with the associated wisdom, traditions, and complex cultural and political activities and practices that continue to the present.

The University of Tasmania also recognises a history of truth that acknowledges the impacts of invasion and colonisation upon Aboriginal people, resulting in forcible removal from their lands, and profound consequences for the livelihoods of generations since.

The University of Tasmania stands for a future that profoundly respects and acknowledges Aboriginal perspectives, culture, language and history, and continued efforts to realise Aboriginal justice and rights, paving the way for a strong future.

This representation has been prepared by the  
Housing and Community Research Unit (HACRU)  
and the Tasmanian Policy Exchange (TPE)  
at the University of Tasmania.

[www.utas.edu.au/arts-law-education/research/housing-and-community-research-unit](http://www.utas.edu.au/arts-law-education/research/housing-and-community-research-unit)

[www.utas.edu.au/tpe](http://www.utas.edu.au/tpe)

**Researchers who have contributed to this submission  
and the underlying research include:**

Dr Julia Verdouw

Professor Richard Eccleston

Megan Langridge

Dr Kathleen Flanagan

Professor Keith Jacobs

This brief submission has been prepared by researchers at the University of Tasmania with expertise in housing policy and a shared commitment to improve housing outcomes for all Tasmanians.

Having conducted detailed and nationally recognised research on the benefits and impacts of short-stay accommodation (SSA) in the Tasmanian housing market since 2018, we support the proposed amendment (PSA-22-1) to insert a new qualification under the definition of 'Visitor accommodation' in the General Resident Zone, the Inner Resident Zone, and the Low Density Residential Zone of the Hobart Interim Planning Scheme 2015.

## PREVIOUS ANALYSIS OF SSA CONDUCTED BY THE UNIVERSITY OF TASMANIA

The University of Tasmania has undertaken detailed, nationally recognised analysis of the growth of the SSA sector in the Tasmanian market. Based on international research, UTAS researchers have proposed a range of regulatory and policy responses that address the impacts of the SSA sector and seek to achieve a better balance with the housing needs of residents (especially those in the private rental market). University researchers' published contributions to the SSA debate in Tasmania include:

- *Housing in Hobart: An overview of the data* (Eccleston et al., 2018-a)
- *Tasmanian Housing Summit Directions Paper* (Eccleston et al., 2018-b)
- *Legislative Council Short Stay Accommodation Inquiry Submission* (Eccleston et al., 2018-c)
- *Insight Three: A blueprint for improving housing outcomes in Tasmania* (Eccleston et al., 2018-d)
- *Insight Eight: Regulating short-stay accommodation in Tasmania: Issues to consider and options for reform* (Verdouw & Eccleston, 2019)
- *Tasmanian Housing Update* (Jacobs et al., 2019)

- *The Tasmanian housing market: Update 2020-2021* (De Vries et al., 2021)
- *Airbnb and the hidden barriers to effective regulation: A case study of short-term rentals* (Verdouw & Eccleston, *Journal of Urban Policy and Research*, forthcoming 2022)

A number of recommendations from this research on the regulation of SSA have been referenced in the Hobart City Council's *Report to Council* on the proposed amendment. Specific findings from this research relevant to the SSA debate include:

- Housing affordability and private rental availability has significantly deteriorated in Tasmania, especially in the Greater Hobart Region, since 2015. SSA is one of the factors that has contributed to this outcome by effectively reducing housing supply by approximately 600 homes in the City of Hobart.
- The introduction of a permit system for SSA provides the basis for regulating the sector but, in isolation, has little effect on the rate at which properties are converted from long-term rental to SSA.
- A pause on the issuance of new permits for entire home SSA rentals in key areas of SSA concentration should be implemented until residential rental market conditions improve. This measure would prevent additional homes being lost from the residential market to SSA while potentially benefitting existing SSA operators given they would face less competition from new providers.

Accordingly, we agree with the analysis presented in the *Report to Council* that the proposed planning scheme amendment (PSA-22-1) would help to mitigate the negative impacts of SSA in the Hobart region by leading to more properties becoming available in the long-term residential rental market.

## THE RISE OF THE SSA SECTOR IN TASMANIA

Our previous research has provided evidence that the growth of SSA has benefited travellers, property owners, and investors in Tasmania, but has also accentuated Tasmania's significant housing access and affordability challenges. Although housing markets are complex, and the current shortage of affordable accommodation has a number of causes (such as higher levels of population growth, a decline in the supply of new homes and high demand for social and community housing), the growth of the SSA sector and its impact on the price and availability of residential rental accommodation has contributed to Tasmania's ongoing housing crisis (Eccleston et al., 2018-c).

Hobart's rental market remains one of the tightest in the country, with rents above pre-pandemic levels (De Vries et al., 2021) (Figure 1). Private rental costs are driven in part by the low vacancy rate, measured at 0.3% in March 2022 (SQM Research, 2022) (Figure 1). Housing analysts suggest that a vacancy rate of 3% is desirable and a vacancy rate below this indicates that demand for rental housing is unlikely to be met, leaving many prospective tenants unable to secure suitable accommodation (De Vries et al., 2021). A rental vacancy rate of less than 1% effectively represents a crisis in the private rental market.

The impact of SSA on the residential housing market is largely determined by two factors: entire home rentals, and multiple entire home listings (multi-listings) being held by the same host (De Vries et al., 2021). Data shows that over the 18 months to January 2018, the number of entire homes listed on Airbnb in the Hobart LGA increased from 250 to 876 (Eccleston et al., 2018-d). If just 70% of the entire homes listed in Hobart in January 2018 were previously in the long-term rental market, it would mean more than 600 homes in inner Hobart alone had been removed from the private rental housing pool (Eccleston et al., 2018-d). Meanwhile, SSA properties that are multi-listings are more likely to be commercially operated for investment purposes. Data shows there has been an increase in multi-listings in the Hobart LGA to nearly half (48%) of all listings in 2019 (Eccleston et al., 2019). While COVID-19 resulted in a statewide fall in SSA listings across 2020, multi-listings have remained stable in Greater Hobart (Verdouw et al., 2021).

With this in mind, it is necessary to distinguish between different forms of SSA use. As Crommelin (2018, p. 442) notes, "some uses of Airbnb are more problematic than others, and targeted regulation should focus on these more antisocial forms of use". In the Hobart context, this means making a distinction between genuine home sharing, and the growing pool of property investors and professional operators using SSA as a vehicle to generate returns on their investment.

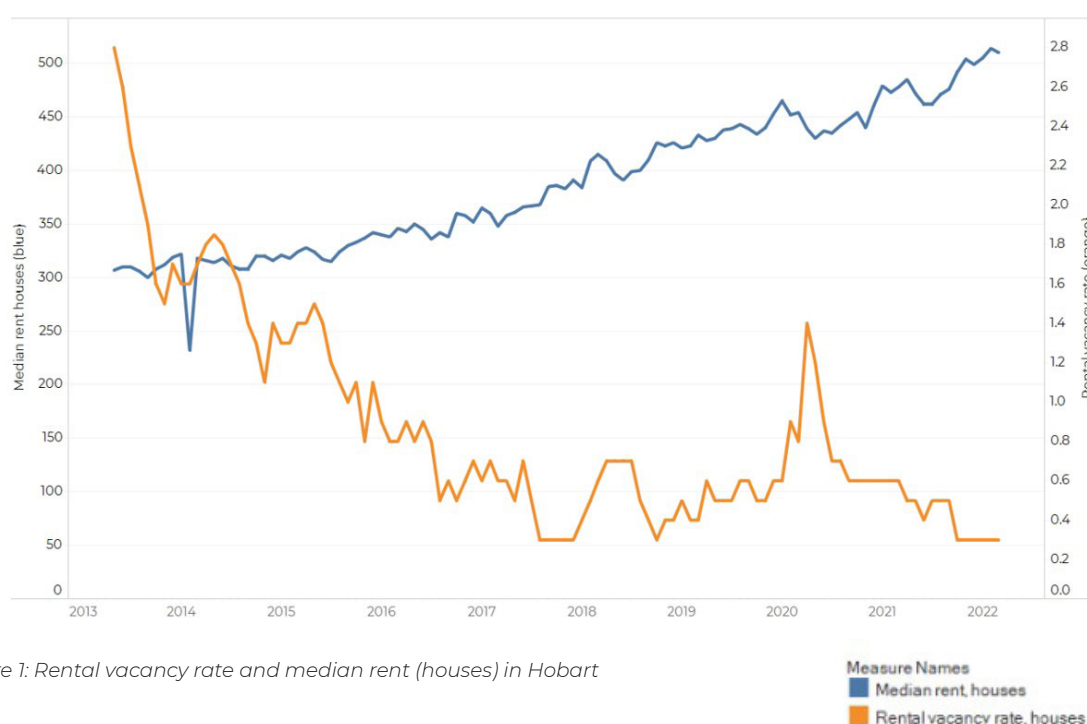


Figure 1: Rental vacancy rate and median rent (houses) in Hobart

## THE CASE FOR A PAUSE

The question facing the Hobart City Council is how to develop an effective regulatory framework that balances the benefits the sector delivers while dealing with challenges it has helped create (Verdouw & Eccleston, 2019). There is emerging evidence that carefully designed regulation – such as permits, licences, and caps – would have little impact on the visitor economy and established SSA operators, but could improve housing outcomes for low-income Tasmanians reliant on the rental market for their accommodation (Verdouw & Eccleston, 2019).

The existing permit system in Tasmania has improved compliance and data capture and has validated our earlier analysis of the growth in the SSA market in Tasmania and elsewhere. However, there is little evidence it has been effective in influencing significant numbers of property owners to take entire homes out of the SSA sector and back into the long-term residential market (Jacobs et al., 2019). Therefore, we believe additional regulatory measures are required to limit further SSA growth in Tasmania.

We have, in the past, recommended that councils implement a pause or a cap on issuing new visitor permits or renewing permits in communities where SSA has been deemed to be having a detrimental impact on rental market outcomes until conditions ease (Eccleston et al., 2018-c). The proposed amendment (PSA-22-1) is in line with our earlier recommendation. The change in definition to ‘Visitor accommodation’ would:

- Prevent additional entire properties being converted into SSA by multi-listing type investors or operators;
- Enable smaller-scale local operators to continue renting a room or several rooms in their primary residence in a more traditional home-sharing sense; and
- Protect the interests of investors who have already established SSA businesses in good faith.

Such a pause would ensure that more potential long-term rental properties are not converted to SSA. The pause need not be permanent; regulatory arrangements could be reviewed when housing conditions have improved, for example when the vacancy rate reaches 3%.

## National and international precedents

As more is understood about the detrimental effects of the SSA sector on local housing markets in jurisdictions around the world, local councils and governments (particularly in highly urbanized or popular vacation areas) have found it necessary to redress the imbalance, resulting in a range of tried and evidence-informed policies internationally (Eccleston et al., 2018-c). Some examples of jurisdictions which have implemented a cap, pause, or moratorium on the issuance of new permits to limit the growth of entire home SSA listings include:

- **Vancouver** – in 2017, Vancouver City Council approved new rules which limited property listings to primary residences only, therefore preventing entire home SSA use (Doering, 2017).
- **New Orleans** – in 2018, New Orleans City Council issued a nine-month interim ban on certain types of short-term rental licenses (new and renewed) in most residential districts, and a ban on new permits in commercial districts (Eccleston et al., 2018-c).
- **Barcelona** – in 2020, Barcelona city authorities implemented a one-year moratorium on all permits to rent SSA to visitors (Spanish Property Insight, 2020).
- **Maui** – in 2021, the Maui County Council placed a temporary moratorium on new transient accommodations. The moratorium will last for two years or until legislation is enacted by council to establish caps on transient accommodation (Tanji, 2022).
- **Chattanooga** (Tennessee) – in 2022, Chattanooga City Council became another one of many examples of smaller local governments putting a pause on new applications for non-owner-occupied short-term vacation rentals (like Airbnbs). The pause will last until January 2023 while additional regulations are developed (Benninghoff, 2022).

Another popular approach to regulating the usage of entire homes as visitor accommodation is imposing a cap on the number of nights per year hosts can rent out their properties as SSAs. This is the approach implemented in New South Wales, where in 2021 new legislation was introduced which capped non-owner-occupied properties to 180 days per year in Greater Sydney and several regional local government areas (O’Sullivan, 2021). NSW is the only Australian jurisdiction thus far to implement regulations of this nature on SSA (EBM RentCover, 2020). Authorities in Western Australia have been investigating a potential registration system for SSA,

however, the only regulations implemented so far have been to address anti-social/disorderly conduct in SSA (Bold, 2022).

Implementing an annual cap on the number of nights entire homes could be listed on SSA platforms in the City of Hobart - as has been done in NSW, Los Angeles, Amsterdam, New York, Paris, and Reykjavik (Laggrave, 2018) - would likely result in a number of homes being returned to the long-term residential market (Leshinsky & Schatz, 2018)<sup>1</sup>. However, emerging research highlights some challenges associated with the approach:

- Compliance and enforcement are complex and involve the ongoing monitoring of the use of all SSA properties. It is difficult to track the number of nights a property is rented due to the reliance on data either shared by the host or by the booking company, which may be inaccurate (Cox & Slee, 2016;<sup>2</sup> van Holm, 2020). Furthermore, critics of SSA are concerned that without effective monitoring, an individual may be able to list their property for the full allotment of days on one booking site, and then shift the listing to an alternative booking site for

another full allotment of days (Adelson, 2018).

- The approach would impact existing and prospective SSA operators whereas a 'pause' strategy will only affect prospective SSA operators and investors.
- If the cap is relatively high (such as the 180 days per annum limit in NSW) compliant operators may simply choose to leave a property vacant for the remaining six months of the year, which would not result in any increase in housing supply. Moreover, providing six-month leases would do little to increase the supply of secure, long-term housing options.

Given these concerns and prevailing housing market conditions in the City of Hobart, we believe that the proposed pause on the issuance on new SSA approvals at this juncture is an appropriate policy response. However, additional measures should be taken if warranted by new developments or worsening conditions in the private housing market.

<sup>1</sup> In San Francisco the 90 day cap on renting entire home listings led to a 5% decrease in listings. However, Leshinsky & Schatz (2018) also found that compared with caps on nights, cities that target hosts with fines had the greatest impact on the number of Airbnb listings, therefore indicating that while introducing a cap on nights did result in some homes being returned to the long-term residential market, other regulatory measures may be more effective (i.e. fines).

<sup>2</sup> On December 1, 2015, Airbnb published a snapshot of data about its operations in New York City, presented as a move towards greater transparency about how its hosts use the platform. Cox & Slee (2016) demonstrate that the snapshot made public by Airbnb was photoshopped, and that Airbnb intentionally removed listings from its site so the data would "paint a more attractive picture of its business" (p. 2). Cox & Slee (2016) argue that Airbnb intentionally misrepresented data as part of a deliberate PR and lobbying strategy.

## CONCLUSION

Having undertaken detailed research on the impact and regulation of the SSA sector in Tasmania over the last five years, we argue limiting the issuing of new permits for entire homes in the short-stay market is an important and effective policy instrument to assist households seeking to rent long-term accommodation in Hobart. While this policy will make a difference to

Tasmania's ongoing housing crisis, it is only one of the many measures required. We look forward to Hobart City Council working with other levels of government on other, equally important and effective measures, especially facilitating the construction of more public housing throughout the municipality.

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**From:** Gerard Webb <djgezza@gmail.com>  
**Sent:** Thursday, 5 May 2022 4:49 PM  
**To:** Representation  
**Cc:** djgezza@gmail.com  
**Subject:** Short stay accom planning amendment

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Gerard Webb  
0415736095

I wish to give my opinion regarding this amendment. The short stay “disruptive” industry has decimated the long term rental pool in Hobart and many other cities around the world. It has led to a shortage of properties available for long term rental and increased rents dramatically. I have watched closely the listings on domain/real estate websites for the last few years as I am a renter and have seen many friends struggle to even secure a home regardless of the price. Whilst many property owners say that these short stay apps have little or no effect on the long term rental market, their opinions are not based on evidence and are fed by greed and self interest.

During the lockdown in March 2019 I watched an increase of 500 homes listed on Domain.com in the hobart area within a week of the borders closing and again within a couple of weeks the average price dropped by nearly \$100pw. This was directly related to the loss of the tourist industry and the demand , or lack of demand for short stay accommodation. The numbers don’t lie ( and neither do I).

While the premise for “airb&b” renting out spare rooms is reasonable the lack of regulation has seen profiteering by people With multiple “whole house” properties and disruption to many communities with no regard for the bigger picture or the suffering it is causing.

Any one who rents their home is in a constant state of anxiety, worrying whether the lease will be renewed , whether the rent will go up or whether they will be kicked out if they ask for repairs to be carried out. This is real and many people are suffering by paying huge amounts of their income on rent and putting up with substandard properties. The lack of regulation is downright dangerous and for those in the tourist industry that have done the right thing in their b&b accommodation by adhering to all the fire and safety regulations it is an unfair playing field. I read this week that after the “Childers” backpacker fire in the 90s , all accommodation businesses must have fire alarms and sprinklers fitted. How many shortstay properties have this ? Has the council inspected any of these properties for safety? Is there even a system in place for this ? Do we need to wait until lives are lost due to the inaction of the government bodies entrusted to keep us safe by regulating this industry.

We are in a real crisis and now the growth and success Tasmania has enjoyed for that last few years is at risk of being undone. Last quarter Tasmania has had negative population growth and Hobart area has also seen people move away in droves. We just can’t afford it !! I know of many people who have left the state in the last year because of not on the in-affordability of the most basic human need ; housing but the inability to even secure a property (regardless of cost).

The government at all levels has swept this under the carpet for too long and now must act for the good of all Tasmanians , not the mainland investors who are pillaging our beautiful and once affordable state.

Gerard Webb  
623 Shark Point rd Penna Tas 7171  
0415736095  
djgezza@gmail.com

Sent from my iPhone

**From:** Lisa Rime <contact-pod@hotmail.com>  
**Sent:** Thursday, 5 May 2022 5:01 PM  
**To:** Representation  
**Subject:** Feedback on Short-Stay Amendment

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Dear Hobart City Council,

I thoroughly welcome your move to introduce a restriction on future entire-house short-term accommodation. This is a real step in the right direction for Hobart.

There is no doubt that the 10% loss of residential rental homes to the short-stay sector has deepened housing stress and homelessness in our community.

Cities all over the world with less alarming statistics have introduced regulations, which work to preserve the needs of residents, and the culture of cities.

The draft amendments as proposed would not negatively impact the current profits of any existing investors, but they would certainly benefit the wider community!

Today I purchased RACT Roadside Assist for a local person who is homeless and vulnerable. It was heartbreaking. I know no-one who isn't aware of our local housing crisis, and horrified by it. We support appropriate action such as this amendment. We don't want to see people suffering needlessly, for the sake of allowing infinite profit for a few already wealthy individuals.

I implore you, our elected leaders, to please represent the people who most need a fair go. A little over 30% of Hobartians are renters and they are virtually all experiencing housing stress.

Sincerely,  
Lisa Rime

**From:** Amanda Moran <megumia82@icloud.com>  
**Sent:** Thursday, 5 May 2022 5:24 PM  
**To:** Representation  
**Subject:** Planning Scheme feedback 2022

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

RE: 'Visitor accommodation' in the General Residential Zone, the Inner Residential Zone, and the Low Density Residential Zone of the *Hobart Interim Planning Scheme 2015*

*There are too many people without basic homes, to be allowing for any more short stay accommodation to be allowed in Tasmania.*

*There is a housing and homelessness crisis.*

*Families (including their pets) are being broken. People are being shattered. They are beyond breaking point.*

*People can't sleep in their cars or in makeshift beds. Outside: it's cold. It's wet. It's depressing. It's unsafe. It's inhumane.*

*It is however, a basic human right to housing.*

*Do your utmost to stop the short stay accommodation destroying our island and people.*

*You must do your best, for the people.*

*You must.*

With kindest regards,  
Amanda

**From:** Tim Slade <cricketgalah@gmail.com>  
**Sent:** Thursday, 5 May 2022 5:35 PM  
**To:** Representation  
**Subject:** I support the ammendment to restrict short-term accomodation.

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To: Chief Executive Officer, City of Hobart

I support the draft amendment to the City of Hobart's interim planning scheme proposing to restrict future short-term accommodation permits in residential areas.

Access to housing is a human right. In the circumstance when this human right is at risk, or in the case of Hobart, where it is unavailable to citizens, and in a great number, then it is the role of government, local and State, to intervene.

The present Air BnB model does not represent the intention and spirit of the original design.

Congratulations to HCC for leading the way in the best interests of its citizens.

Thank you.

Sincerely,

Tim Slade (B.Ed.)

Poet author of *The Walnut Tree*, [www.brightsouth.com.au](http://www.brightsouth.com.au), 2021

Articles, 2013-2022: [Tim Slade - Tasmanian Times](#)

Website: [www.tim-slade.jimdosite.com](http://www.tim-slade.jimdosite.com)

Awards: 2021 Finalist in the Tasmanian Disability Festival Awards ~ Tasmanian Volunteer of the Year, Excellence in Advocacy, and Excellence in the Arts.

Facebook: [Tim Slade | Facebook](#)

Address: 8 Moore Street, Pioneer, Tasmania, Australia, 7264

Telephone: (03) 6354 2200

**From:** Danielle Gray <danielle@grayplanning.com.au>  
**Sent:** Thursday, 5 May 2022 7:20 PM  
**To:** Representation  
**Subject:** Representation against amendment PSA-22-1  
**Attachments:** Accommodation amendment representation 5 May 2022 PSA\_22\_1.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear CEO

Please find attached a representation that opposes the application to amend the Hobart Interim Planning Scheme 2015 (the interim planning scheme) by inserting a new qualification for 'Visitor accommodation' in the Use Table in each of the General Residential Zone, the Inner Residential Zone, and the Low Density Residential Zone (Council reference PSA-22-1).

If you wish to discuss, please contact the undersigned.

regards

**Danielle Gray** B.Env.Des, MTP, MPIA  
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A: 224 Warwick St, West Hobart, TAS, 7000

Danielle Gray, Principal Consultant  
Gray Planning  
224 Warwick Street  
West Hobart TAS 7000

5 May 2022

The Chief Executive Officer  
City of Hobart  
GPO Box 503  
Hobart TAS 7001

Dear Ms Griggs

**Representation against application to amend the Hobart Interim Planning Scheme 2015 (the interim planning scheme) by inserting a new qualification for 'Visitor accommodation' in the Use Table in each of the General Residential Zone, the Inner Residential Zone, and the Low Density Residential Zone (Council reference PSA-22-1)**

I, Danielle Gray of Gray Planning wish to make a representation opposing the proposed application to amend the Hobart Interim Planning Scheme 2015 (the interim planning scheme) by inserting a new qualification for 'Visitor accommodation' in the Use Table in each of the General Residential Zone, the Inner Residential Zone, and the Low Density Residential Zone.

This representation is prepared on the basis of my personal and professional concerns about the amendment.

This planning scheme amendment application has been initiated by City of Hobart Aldermen and prepared by Council staff at Council's directive. It is my view that the amendment has been initiated on behalf of political interests and views of Aldermen and seeks to address an issue beyond the realm of the planning system to solve and by doing so, disadvantage property owners in the City of Hobart.

The lack of affordable housing is not just a City of Hobart issue but is a global issue. The amendment seeks to penalise property owners only in the City of Hobart and only in certain zones and has been initiated without any supporting evidence whatsoever.

Furthermore, the application has been prepared without any strategic planning merit and comprises a series of assumptions and claims not backed by any evidence, studies or



statistics and submits a Council report peppered with motherhood statements to justify the proposed amendment.

It is extremely disappointing that elected representatives of the City of Hobart would choose to use the planning process to further their own political views as a result of being influenced by a vocal minority in the community and organisations such as Shelter Tasmania. The provision of affordable and social housing is not the primary responsibility of private property owners. The amendment seeks to shift responsibility from the government onto private property owners in an attempt to resolve complex issues such as housing affordability, social housing deficiencies, homelessness and housing availability.

Council is attempting to circumvent the planning process that has resulted in the implementation of the Tasmanian Planning Scheme by 'going its own way' and choosing to make up its own regulations outside of State Planning Provisions where a particular use class is otherwise No Permit Required or Permitted.

There has been no information provided as to why the proposed amendment is applicable to certain zones in only the municipality of Hobart.

If approved, this amendment will result in an undesirable precedent where the planning process is used to attempt to address complex social and economic issues without any justification or any evidence that changes to planning policy will make any meaningful difference.

The following comments are made against the deficiencies of the planning report prepared by Council staff at the directive of the City of Hobart elected representatives that attempts to justify the proposed amendment.

The purpose of the amendment seeks to prohibit entire home short stay accommodation use (SSA) (excluding for 'secondary residences') in all residential zones throughout the City of Hobart municipal area. This will impact thousands of properties.

In section 1.2 of Council's planning report, it is claimed that *"the report will benefit the community by proposing a planning scheme amendment that may help to mitigate negative impacts of short stay Visitor Accommodation"*.

No evidence has been provided by Council that the amendment will mitigate negative impacts of short stay Visitor Accommodation.

Furthermore, no evidence has been provided by Council of what constitutes 'negative' impacts with respect to Visitor Accommodation use and development. As part of the application, Council has not provided any evidence in their municipal area of the impact of the approval of Visitor accommodation in residential areas.

It is considered that the planning process for Visitor Accommodation applications already enables consideration of amenity as part of the assessment of Visitor Accommodation where a discretion has been triggered.

A blanket prohibition of the Visitor Accommodation use bypasses the democratic and level playing field of the planning process and a process that otherwise equally applies to every





other municipality in Tasmania. The amendment proposed by Council is unreasonable to City of Hobart property owners of residential zoned land and unfairly disadvantages them when it comes to options for the use of their properties.

Furthermore, even where private property owners have no choice but to enter their properties into the private rental market, Council has provided no evidence that such properties will result in increased housing opportunities to the homeless, provide social housing, low cost housing or even affordable housing.

The amendment effectively seeks to force the owners of investment properties to have no other alternatives for use of their properties other than offering these properties for private rental, thus forcing them to compensate for the government's systematic failure to provide adequate social or affordable housing.

As a long-term property owner in inner Hobart and a previous renter in inner Hobart suburbs (Sandy Bay, Battery Point and South Hobart) I can confirm that I have never personally had my amenity as a resident negatively impacted by nearby or adjacent short term accommodation use. I currently live directly adjacent to a Visitor Accommodation use in operation and did not realise this property was used for such purposes for at least 8 years.

Alternatively, as a property owner in West Hobart since 2004 I have made multiple complaints to Tasmania Police about the use of rental properties immediately adjacent to my residence that has affected my residential amenity in terms of the noise and behaviour of rental residents.

As a resident, I have also experienced issues with adjacent properties impacting my residential amenity with respect to the lack of maintenance of rental properties, proliferation of rats being present/sheltered at these properties that have caused damage at my own residential property, parking issues from residents and their visitors of these properties such as parking over driveways and leaving cars in the street for months without moving them and also antisocial behaviour of tenants including using backyard incinerators and regular disturbances of the peace involving alcohol consumption, 24 hour parties and fights involving police attending the property.

For Council to claim that all and every Visitor Accommodation in a residential zone in the City of Hobart results in negative impact is absurd, is without merit and has been asserted without any evidence being submitted to justify the application.

Such applications for Visitor Accommodation use should be assessed on a case by case basis.

Under Section 4 of the Council report, there is history summarised that since 2020 Council has had short stay accommodation in their sights and multiple resolutions have been made by Council to prepare reports and advice as to the merits or otherwise of short stay accommodation.

To my knowledge as a town planner operating a town planning consultancy in Tasmania and also a resident of the City of Hobart, it is not known if any of these resolutions have been fulfilled or even commenced by Council. Certainly, no supporting material has been



provided with the proposed amendment, so it is assumed that none of the reports or advice sought by Council in multiple resolutions have even been undertaken. If that is the case, Council's amendment has been prepared with no merit or evidence whatsoever and accordingly should be refused by the Tasmanian Planning Commission.

Under Part 6 of Council's report it is claimed that *'The proposed amendment is consistent with the objectives of the Capital City Strategy Plan 2019-29'*.

It is strongly disputed how consistency can be claimed in the absence of even a single piece of research or background supporting material cited by Council and submitted as part of the application about the merits of otherwise of Visitor Accommodation and its link (or otherwise) with other issues such as housing availability and affordability.

In the absence of any detail, evidence, independent studies or reports providing justification for claiming the Strategic Plan outcomes are consistent with the proposed amendment, the amendment should be accordingly refused by the Tasmanian Planning Commission.

Section 8.3 of the Council report claims that the amendment is in accordance with the objectives of the Act and will *"provide for the fair, orderly and sustainable use and development of air, land and water"*.

It is considered that the blanket prohibition of a specified use class within residential zones only within the City of Hobart without any evidence, studies or reports providing justification for the amendment cannot be considered fair for City of Hobart property owners who will be affected.

Under 8.4 of the Council report, there are further claims made justifying the amendment without any evidence of supporting material in the form of independent studies or statistics.

Under section 8.7 of the Council report it is claimed: *"In particular, the proposal is consistent with STRLUS State Policy SRD 2 'Manage residential growth for Greater Hobart on a whole of settlement basis and in a manner that balances the needs for greater sustainability, housing choice and affordability'"*.

The Policy in question relates to settlement patterns and application of the Urban Growth Boundary as opposed to appropriate land uses in existing developed areas. The amendment provides no evidence whatsoever that the prohibition of Visitor Accommodation in residential zones in the City of Hobart will balance the need for housing choice or affordability.

In fact, there are many issues that play into housing affordability at a local, national and global level. The amendment is a kneejerk reaction to public pressure being placed on Council aldermen to use the planning scheme in an attempt to address an issue that goes well beyond the planning process itself to solve.



Section 9 and Section 10 of the Council report again make unfounded statements and baseless claims about ‘evidence’ without providing any supporting materials, studies, reports, statistics or research while also sidestepping the fact that a select but very large group of affected property owners will be disadvantaged by the proposed amendment in terms of the range of use class options that they can no longer apply for against statewide provisions that otherwise apply to everyone other residential property owner in Tasmania.

The amendment has been proposed by Council aldermen with good but misguided intentions.

The proposed amendment represents a tokenistic attempt to use the planning process to disadvantage a select group of the community (property owners of residential zoned properties within the City of Hobart) in a clumsy and simplistic manner to address an extremely complex issue (housing affordability and availability) that needs to be the focus of substantial research prior to making decisions about amending or creating planning policy. Any changes or introductions to planning policy should only be made on the back of significant and substantiated claims that apply across the board in Tasmania and to be applied consistently within the planning process.

As already stated, the provision of available and affordable housing and social housing is not the responsibility of private property owners. It is the responsibility of government to facilitate and provide affordable housing and social housing. This amendment is passing that responsibility onto private residential property owners in the City of Hobart municipality.

It is my view that many of the affected properties are located in Hobart suburbs where property prices will continue to remain very high despite any changes to allowable uses in the planning process.

Many of the affected properties comprise 19<sup>th</sup> century housing with characteristics such as very small floor areas, lack of private open space, non compliance with contemporary privacy development standards and a lack of available on or off street parking that are simply incompatible with long term permanent residential use. Such properties should be available for short term accommodation so long as it can be demonstrated that residential amenity will not be adversely impacted.

Many of the Hobart properties to be affected by this amendment also have considerably higher weekly rental rates than suburban areas outside of the municipality with this being most commonly linked to property prices per se. One only has to compare average weekly rental rates of areas such as Glebe, Battery Point, Sandy Bay, West Hobart, North Hobart and South Hobart with average rental rates for outerlying suburbs in adjacent municipalities in well placed areas likewise close to public transport, shopping and employment areas such as Kingston, Moonah, Warrane, Bellerive, Glenorchy, etc. The proposed amendment will not result in such Hobart properties magically becoming affordable.

As a planner I would suggest that there are other policies that Council and the State Government could consider to initially address housing affordability and shortages including penalising the owners of long term vacant housing and residential zoned land, reduced rates



for rental properties, and Council owned land and vacant properties being developed for low cost housing.

It is further my view as a planner that the rigidity of the application of the Urban Growth Boundary under Land Use Strategies has also contributed to residential zoned land shortages in Tasmania and exacerbated the cost and availability of housing in Tasmania. I have personally been the applicant of multiple residential proposals (rezoning to facilitate aged care and also rezoning to facilitate residential subdivision) that have been refused by Councils or the Tasmanian Planning Commission as a result of sites being simply located outside the Urban Growth Boundary.

Amendments to planning schemes to address the issue of housing availability should only occur on a statewide and consistent basis and where comprehensively backed by independent research. Amendments should not occur as a result of elected members being petitioned by community groups and should not occur in an ad hoc manner without any demonstrated planning merit.

The amendment has not provided any such background information and will disadvantage a large number of City of Hobart rate payers and residents without any proven positive impact on housing affordability or availability.

It is considered that the proposed amendment should be refused by the Tasmanian Planning Commission as a result of its lack of planning merit and total failure to provide any evidence justifying the amendment.

Should you wish to discuss the above, I may be contacted on 0439 342 696.

Yours faithfully



Danielle Gray B.Env.Des. MTP. MPIA  
Principal Consultant, Gray Planning



**From:** Amy Barrett <e.amy.barrett@gmail.com>  
**Sent:** Thursday, 5 May 2022 7:42 PM  
**To:** Representation  
**Subject:** PSA-22-1 Amendment – Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear CEO of Hobart City Council

My name is Elizabeth Amy Barrett and I live at 1/126 Bathurst Street Hobart.

I write in support of the amendment to stop new Short Stay Visitor Accommodation permits from being granted. Hobart is in the midst of a severe housing crisis. A large number of houses and apartments in Hobart have been removed from the housing stock and turned into visitor accommodation. This has put more pressure on the rental market in Hobart.

While I recognise that short stay accommodation is not the only factor in the shortage of rental properties for locals, it does play a part. A quick and easy way to slow the pressure on rents and housing prices is to stop more homes being removed from housing stock. It is one of the few things governments can do to make an immediate difference.

Further I would ask the council to consider stopping short stay accommodation permits from being transferred when a house or apartment sells. This would see this accommodation being returned to their proper use as homes.

Thank you for your consideration.  
Elizabeth Barrett.

**From:** Nicola Mason <nic@smittenmerino.com>  
**Sent:** Thursday, 5 May 2022 8:32 PM  
**To:** Representation  
**Subject:** Short Stay amendment

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good evening

I would like to put forward my enthusiastic support of the draft amendment to the City of Hobart's interim planning scheme proposing to restrict future short-term accommodation permits in residential areas.

Our city and surrounding residential areas thrive on community, which means knowing your neighbours and there is no community, and urban growth without affordable housing, predictable neighbours and stability within our city and suburbs.

All people deserve to live in a street that feels safe, with continuity of residents surrounding them, and an opportunity for our local population to thrive, not just the passing trade of tourists. We need to consider and care for permanent Tasmanian residents who support our local economy all year round.

thank you for your time,

kind regards  
Nicola Mason

**From:** Maddy Gmail <madels81@gmail.com>  
**Sent:** Thursday, 5 May 2022 8:59 PM  
**To:** Representation  
**Subject:** Short stay accommodation amendments

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello

Due to the rise of short stay accommodation I fully support the draft to effectively cap str ,I don't believe any new permits should be approved there are already too many . I applaud council for taking this approach.

Aside from housing affordability/crisis what I am extremely disappointed with is living surrounded by str we have amenity issues, safety issues, parking issues yet many of these investors dismiss neighbours concerns ,I did not buy our home to be surrounded by unhosted airbnbs ,yet this is what is happening.

So thanks for listening I look forward to the proposal to cap airbnbs and make the world a better place.

Regards Maddy

**From:** Bridget Bible <bridget\_bible@yahoo.com.au>  
**Sent:** Thursday, 5 May 2022 9:42 PM  
**To:** Representation  
**Subject:** Limit whole house short stays in the Hobart LGA

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Dear Friends,

People around Australia and in Hobart are facing homelessness due to the amount of whole house short stays. These holiday lettings take away rental stock from the community. This is forcing people into homelessness. This directly affects the wellbeing of our community.

With 10% of the rental market locked up in short stay accommodation we need change. We need to restrict short term holiday lettings.

This will benefit everyone in the community.

Thank you.

Kind regards

Bridget

Bridget Bible



**From:** kate kelly <katemollykelly@gmail.com>  
**Sent:** Friday, 6 May 2022 9:05 AM  
**To:** Representation  
**Subject:** Representation in support of short stay amendments  
**Attachments:** representation Kate Kelly.docx

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please find attached my representation submission IN FULL SUPPORT of the HCC motion to amend short stay rules in the Hobart LGA.

With regards,

Kate Kelly  
Hobart citizen of the year 2020  
Housing Advocate  
Founding member- Housing with Dignity Committee Administrator/ Founder of Hobartians Facing Homelessness group.

I am writing in support of the short stay rules amendments requested by Hobart City Council.

The short stay sector in greater Hobart has taken has taken 10% of the rental housing market away from Hobartians, who currently can't find a home.

The Anglicare Rental affordability snapshot for 2022, found that on one weekend in March, NOT A SINGLE rental property in the Hobart LGA was deemed affordable for a person on a pension.

This would extend to anyone on a lower income than \$36,000, including casual waged single parents, youth, students, people with disabilities, carers and many aged residents.

Given that Tasmania has the 2nd highest national rate of people living on welfare, some of the lowest wages in the country, and is the 4th most profitable buyers market globally, to add whole house short stays to the mix at this time is a complete dereliction of Government to provide or preserve the U.N sanctioned human right of adequate and secure, affordable housing.

The growth of investor led short stay property acquisition will NOT self regulate, as has been evidenced in other jurisdictions worldwide.

Byron Bay has lost 50% of its rentals to Air bnb, and towns like Derby, St Helens and other sought after tourist locations will follow suit, and are already feeling impacts-

with tourism and local industry workers struggling to find somewhere to live.

Let's not allow our state to have ghost town suburbs of for-profit home hoarding, whilst locals sleep rough, or leave.

Other cities across the world have been forced to regulate the short stay sector, for exactly the reasons we are now having to regulate it in Hobart, and regulate, we must.

I fully support the motion by HCC to do this, to request an end to short stay whole houses in the local government area of Hobart, and support the other requested amendments to short stay legislation put forward by Hobart City Council.

Please think of local people first.

We must do all we can to provide housing at a local level, and preserve access to rentals.

Regulating the short stay sector is one thing that will make a tangible and quantifiable difference to fixing the problems of accessing housing- that the cohorts I represent experience every day. These problems are dire and worsening and action to stem all unintended flow of available homes into private visitor accommodation must be on the table.

I commend HCC for this recommendation, and I hope this motion passes into action .

With regards,

Kate Kelly

Hobart citizen of the year 2020

Housing Advocate

Founding member- Housing with Dignity Committee  
Administrator of Hobartians facing Homelessness group.

**From:** Karin van Heerwaarden <karinvanh@gmail.com>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I make my historic Battery Point property available on Airbnb so that visitors to Hobart can enjoy comfortable accommodation in a beautiful and convenient part of the city. My property can sleep up to 9 people and so is very popular with large family groups and wedding groups in particular. For these groups, staying in a house with all the amenities they need and be able to share a home during their stay ensures a far more enjoyable experience than staying in multiple hotel rooms would. The guest reviews I receive consistently mention the location and how much the guests love being able to stay in Battery Point. This is only possible with short stay accommodation.

Hobart is so incredibly popular with visitors from interstate that short stay accommodation such as that made available on Airbnb helps meet the demand that can't be met by hotels alone. Adequate accommodation ensures that everyone who wants to visit Hobart is able to and it benefits so many local businesses - restaurants, tour operators, local artists not to mention all those businesses supporting the short stay properties. I use the services of a cleaner, a gardener, a laundry service and multiple tradespeople.

Banning short stay accommodation will have a significant negative impact on Tasmanian tourism and the economy. And personally it will significantly impact my family's income and ability to secure our financial future.

Regards,  
Karin van Heerwaarden

**From:** Vicky Ions <[vickyions@westnet.com.au](mailto:vickyions@westnet.com.au)>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host to provide an income in my retirement ,and also because I enjoy meeting people and providing a high class service to them at an affordable cost, and also because I love to share the beautiful city of Hobart with others.

Of course this is a valuable and worthwhile service which benefits the many tourist and hospitality businesses in the Hobart region and Tasmania as a whole.,

A ban on short stay accommodation in Hobart will be to the detriment of the tourist industry there, and send out negative signals to travellers, who might choose other destinations where they still have this accommodation <http://option.My> self and my family will also lose our valuable income and an enjoyable occupation

Regards,  
Vicky Ions

**From:** Lauren Benson <bennotas@gmail.com>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I rent my fully furnished house on medium to long term contracts (most recently a 2-year lease) but have used AirBnB in between contracts allowing me time and space to do property maintenance before the new tenant moves in, without losing my entire income during that time.

Home sharing is a practical way for landlords with furnished properties to fill gaps between medium and long term rental contracts (the addition of furnishings often leads to additional repairs and cleaning in between tenants). It's also a way for families to help fund their occasional holidays away, for people who travel regularly for work to ensure their home isn't left empty in their absence, for families to offer their families on the mainland a place to stay when they visit, and for families or large groups visiting the state to find affordable and comfortable accommodation

I think the ban will discourage families with children and young or low income groups of friends from visiting Hobart and Tasmania more broadly. Based on data published by the Tas Government regarding the tiny fraction of homes that are short-Term rented, I also don't buy that the ban will have a meaningful impact on the availability or affordability of long-term rental properties; a problem that should be addressed through investment in public and low cost housing, zoning and planning adjustments, banning corporate landlords, requiring owners of long-term empty homes to pay additional fees and taxes, fully funding building qualifications, and Federally addressing negative gearing laws. My next door neighbor has three family homes in 7000 postcode that have not been lived in for at least 15 years - 2 of those houses are no longer repairable and would need to be pulled down - why should he be allowed to keep these off the short or long-term rental market without penalty while others who maintain their homes and offer them occasionally for short term rent are punished?

I am certainly open to some limit on the number of days in a year that a whole house can be available for home sharing (e.g. 6-months) but a full ban leaves no room open for the many people who do not offer their home for permanent short-Term sharing. The ban will impact my ability to cover the costs of lost rent and repairs while conducting repairs and maintenance on my property in between rental contracts, or to simply fill in the time between the end of one contract and the start of the next, which affects my ability to cover mortgage payments.

Please do not go through with this ban, and find more effective ways to address housing affordability and availability in Hobart.

Regards,  
Lauren Benson

**From:** Megan Gale <megan.gale@alirenste.com.au>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Hosting has been important to us as we offer accommodation for families. When we travel overseas, we can book an apartments or whole houses in all the world's capital cities and stay together as a family. In Hobart, once these new rules come in, families will be relegated to the outer suburbs if Battery Point and inner Hobart houses and whole apartments are banned or be forced to book costly multiple Hotel rooms. They will not have a choice. It is quite discriminatory against a family.

Not every traveller wants this experience of shared or home accommodation. Some prefer daily bed linen and cleaning. Home accommodation provides choice particularly with self meals and laundry facilities for families.

We will stop hosting if the changes commence.

Regards,  
Megan Gale



**From:** Maria Reid <m82@telstra.com>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I have been hosting an entire home for 4 years. I've met every group of friends or families that have enjoyed the comfort of a home environment for their stay. We provide additional comfort for infants and small children, by providing high chairs, cots, toys, a full kitchen and suitable cutlery etc and this encourages families to visit Hobart because that can care for their family in comfort. This makes holidaying as a family possible for these guests. During the time they I have been a host, i myself have had 2 periods of unemployment. The income from the bnb has enabled me to pay my rates, land tax and maintain my priority to a high standard. None of this would have been possible with 'rent'. Or should I say, it would have been possible if I chose to rent the property out but I'd be wanting far higher rent than the Hobart market expects. Our home is a credit to the Tasmanian tourism sector. We maintain 5 star ratings, enjoy repeat guest and meets a gap in the market that hotels can not and will not ever be able to meet at an affordable price for travellers to Tasmania. Tourism is not just hotels, bars and restaurants for visitors in a standard hotel room. It is much more. It is about submerging yourself into a community, talking to locals (bnb hosts), feeling safe and comfortable with those you are travelling and enjoying all that the Hobart has to offer. Our guests often shop at the Farmers Market, Salamanca and local wineries to have meals prepared in home at the bnb. This is another way of supporting the local economy in ways that traditional travellers will it. We pay a cleaner, we buy fresh fruit and flowers, Tassie wine for each guest, all contributing to the local economy. Our family love hosting, it's an extension of our lives and income that allows us to have a better love. We've loved through high interest rate and high land tax, council rates, insurance hikes, and now a lasting pandemic. Penalising us, the beet people that pay the bills and loan repayments is not something a council should have an opinion on, especially a narrow one. I'm happy to rent my home out, however it won't be helping homeless find a bed. Frankly, our rent will need to be well over \$1000pw to cover the costs of owning the home. Bnb's are helping the rental market stay dampened. With the influx of bnbs to rental, it will be commonplace to have rent that reflects the true cost of owning the a property in 2022. Other landlords would have a higher benchmark to then charge more also.

See my previous reply. We contribute more than the HCC have thought about. We keep out home well presented, tidy and maintained. We are a rating based service unlike a rented home that can go to ruin and the council never step up and ask for fresh paint, gardens to be tidied etc.

As above.

Regards,  
Maria Reid

**From:** Francis D'Emden <demdenfrancis@gmail.com>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I own a block of four, one bedroom apartments in West Hobart. For the past 5 years, two of the apartments have been listed on Airbnb and prior to the pandemic provided a reasonable income that allowed for substantial renovation. Presently I live in one, one is listed on Airbnb and is generally occupied by visitors, both tourist and those seeking a longer stay. Two now have long term tenants. This flexibility has been vital for the development of the property's utility.

My Airbnb apartments provided a highly sought after facility during the peaks in Hobart tourism. This type of accomodation service is essential for the vitality of Hobart businesses.

I would not expect my property to be included in a ban on some types short stay accommodation.

Regards,  
Francis D'Emden

**From:** Bec French <becfrench76@gmail.com>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host for a range of reasons. I initially started doing Airbnb to enable our family of five to have a holiday easily as many places suit four people. After that I opened another one because I rented properties for years and felt that they were never looked after very well and I enjoyed being able to keep my investment in good shape.

My teaching career started to change with far more demands coming into the job meaning that it wasn't sustainable with also caring for my own family needs, so I needed another way to make an income that also enabled good care of my own children. Airbnb was perfect for that.

We also have a restaurant, so the flow on effects to other businesses via Airbnb stays is obvious. Airbnb offers a unique and artistic approach to hospitality and that in itself shapes the culture of Hobart. Think fires places, historic buildings where their story is celebrated, local producers when we include amazing tasty treats, videographers, photographers, websites, art, antique shops, small business linen, it goes on and on.

The trajectory for Hobart is clear, there is huge demand for short term accommodation and housing. Airbnb is just the easy scape goat for an issue RE housing shortage. It is so short sighted to put a ban on Airbnb and pedal Hobart back to pre Mona days... high unemployment and no tourists coming. The govt need to prioritise building affordable housing and plenty of it... sit back and watch the place thrive and stop whinging about people having a go with improving their and their communities lives. You put a cap on the Airbnb's and watch the same issues continue, only with a pull back in tourism numbers as well.

Regards,  
Bec French

**From:** Simone Chatain <simone.chatain@gmail.com>  
**Sent:** Friday, 6 May 2022 10:01 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Although we don't currently rent out our entire home through Air b n b I would Be disappointed to not have the opportunity in the future . Thankfully through the pandemic with loss of income we have been able to make ends meet by air b n bing our granny flat. A wonderful opportunity, a saving grace and a fabulous option for visitors to the state we have accommodated for days on end when nothing else was available or affordable to them.

Hosting as an air b n b has provided tourists with affordable and convienient options. Hobart and our local cafes, restaurants and tourism destinations have certainly benefited from facilitating this opportunity. Air b n b hosts often provide recommendations to guests and tourism information that promote local business and attractions. Air b n b offers options for those that may look elsewhere (other states) if it's all too expensive and unavailable.

As we air b n b our detached granny flat there is no impact as I understand thi didn't effected. However I might like the opportunity to air b n b my home for short periods as it provides me as the home owner with flexibility.

Regards,  
Simone Chatain

**From:** Annie Fagan <faganam@gmail.com>  
**Sent:** Friday, 6 May 2022 10:02 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host within my own home, so this proposal does not affect me personally. I am a pensioner and the allowance from Airbnb enables me to travel overseas and within Australia to visit my daughter and grandchildren and other family members.

I believe a limit rather than a ban on whole home Airbnb businesses would solve some of the rental problems and be fairer to hosts, also to encourage tourists to Tassie

Fewer tourists, a slight in Tasmania, more landlords being persecuted by renter' demands and the support they receive as opposed to landlord support.

Regards,  
Annie Fagan

**From:** Carlos Gavan <carlos.l.gavan@gmail.com>  
**Sent:** Friday, 6 May 2022 10:02 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host as a means to supplement the income from my job.

Our guests prefer to stay in homes not hotels.

Prohibiting hosts from offering their properties on Airbnb won't solve the housing crisis. That issue requires a policy approach that targets the unfair distribution of wealth that puts more and more properties into the hands of "mum & dad" investors and out of reach for young first home buyers

My offering sits in a different municipality. Otherwise such a ban would finish my income meaning less food on the table less petrol on the car less clothes on our backs

Don't do this. It's silly and it's being done to appease the gripes of a few sad sacks who are jealous of Airbnb hosts making a little extra cash while they themselves aren't bright or adventurous enough to

Regards,  
Carlos Gavan

**From:** Maxine Lowry <maxinelowry@gmail.com>  
**Sent:** Friday, 6 May 2022 10:02 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I have a “short stay” apartment in Battery Point (it is not in the historic precinct).

My three bedroom apartment offers a level of independence and self sufficiency to guests, and a ‘home away from home’ that hotels are unable to offer. I am unofficially an ambassador for the tourism industry and take my role seriously, liaising closely with my guests to recommend venues, tours and attractions, highlight aspects of our city that they may otherwise miss..... basically providing a free advocacy role for a myriad of small business operators. My deep knowledge of Hobart enables me to add considerable value to the visitor experience.

My Airbnb provides my retirement income stream (in lieu of superannuation funds) so I will be impacted in a way that superannuates are not. I often accept guests who find all the hotels booked out, so clearly there is currently insufficient accommodation for tourists and business travellers.

Regards,  
Maxine Lowry

**From:** Melanie Spears <melaniejanespears@gmail.com>  
**Sent:** Friday, 6 May 2022 10:02 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Dear Hobart city council

I live in Hobart City however travel the mainland to work 6 time's a year. During my time away, I let my home to families and couples who are seeking a city retreat. I also share my home when I'm there . I thoroughly enjoy this opportunity as it provides a lifestyle opportunity For me as a single 52 yo professional woman . meeting and hosting new people also supports my heavy mortgage .

If the rules on short term letting were to change , my property would not go on the usual rental market. Nor am I interesting in sharing with young students. Please don't be backward in your tourism planning. Hobart needs alternative dwellings in the city that showcase the historical value of the city , as well as offering a personal , warm local welcome . I hope you get this one right.

It's now a lifestyle choice for me , connecting with visitors and sharing local information.

Being an air bnb host supports my mental health. The sharing economy is a win win for humanity . Hobart needs to be progressive.

Personally , if the decision To block this opportunity prevails I will need to sell my home and move out to the suburbs.

I can't think of any good reasons to ban air bnb, unless it's political , and large developers want to capture the tourism market.

Please don't let this happen.

Regards,  
Melanie Spears



**From:** Zhongjie Chen <aaron4tc@gmail.com>  
**Sent:** Friday, 6 May 2022 10:03 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

The short term hosting has become my regular job. It's very satisfying for both me and the guests. They all feel more like home and more flexible compared to hotels.

The guests in my property become regular customers of the local store and restaurants in the Mt Nelson region.

Tourists will have to spend more money for the same stay period in hotels, in terms, potentially shorter stay in Hobart.

Regards,  
Zhongjie Chen

**From:** Clarissa Leary <info@mtrumneyescapes.com.au>  
**Sent:** Friday, 6 May 2022 10:03 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

I host outside of Hobart and love sharing my experiences with guests. The reason I have a tourism business is for the benefit of my daughter who is down syndrome. This is her life and her future income.

I don't agree with any council have the authority to question how owners should use their properties. Whether it's to live, rent out long term or short term accommodation. It seems that owners are having less rights with their own properties.

The people of Hobart are have had airbnb short term accommodation for years now and this it's not fair that they are suddenly going to be stopped from doing this. This would mean a great impact on tourism and a massive impact on those owners, where they may not be able to afford their properties.

Also, is this because of the University of Tasmania being allowed to buy out most of Hobart and add accommodation all around Hobart. Because it certainly seems that way.

Give back the rights to owners. I don't agree with what you are doing.

This will also impact businesses around Hobart like cleaners, linen companies, amenities and local shop owners.

What is the council going to gain by doing this? It is a short term gain not a long term gain. For long term rentals, start allowing people to add more levels to their houses, find other better solutions. Also, what is the impact on roads - how about finding better long term solutions to this, instead of trying to stop owners from renting their properties.

Regards,  
Clarissa Leary

**From:** Eve Dembowski <stoneflower@iinet.net.au>  
**Sent:** Friday, 6 May 2022 10:04 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

My husband & I bought 2 properties in Hobart, as we love the city and have intention of one day retiring down here. One was a house with an old convict built barn at the back, which we renovated originally as our pied-a-terre to the city we love. In order to be able to afford this, we started renting the Barn as short stay accommodation.

The 2nd property we bought was an old stone cottage that we lovingly renovated. These are beautiful spaces full of history and a real asset to Hobart. It is only because we have made it our business that we could afford to undertake these projects.

Hobart is a city that we have watched grow into a vibrant hub of activity and culture. Our Airbnb experience has been wonderful and the people who use Airbnb and other short term accommodation sites, do not want a hotel experience. They are looking for a more unique experience, which is what we provide.

The main house has been tenanted long term since we bought it 20 years ago. Our intention was to renovate it to a similar standard as both the Barn and cottage and then to move into it within the next 5 years. We intended to put it on short term accommodation for a few years in order to justify the cost of the renovation. Having these short term accommodation forces us to maintain the properties to their highest level, providing work for trades people, cleaners, and other service providers. We love this business and I find it very short sighted to try and stifle a growing sector of the economy in order to appease a few and score some political points.

Home sharing and short term accomodation provides a myriad of benefits. Firstly it employs people and attracts tourists that spend their money throughout the region. Tourism is one of the few areas of economic growth, and visitors today want a more unique experience.

Since we already have our permit the ban will not effects us initially, but long term it will have the effect of reducing the available accommodation, pushing prices higher and eventually it could reduce the attractiveness of Hobart as a place to visit. It could mean that we rethink our plans to renovate our house and even move to Hobart. The vibe that has been built around Hobart could be killed off by such a short-sighted move.

It will however be a boon for Launceston and other areas in the state. But it will not help the problem of affordable housing in the city...

Regards,  
Eve Dembowski

**From:** Ross Smith <rossflyingfox@gmail.com>  
**Sent:** Friday, 6 May 2022 10:05 AM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

We have an Air BnB in the City. It is a unit. We are now retired and it does allow some income for us.

Provides alternate accommodation choices for those visiting our City. very important and without it there would be fewer visitors

Fewer visitors.

Regards,  
Ross Smith

**From:** Peter Phibbs <peter.phibbs@sydney.edu.au>  
**Sent:** Friday, 6 May 2022 11:38 AM  
**To:** Representation  
**Subject:** Submission on Short Stay Accomodation Planning Scheme changes

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Madam/Sir

My submission on changes to your planning scheme are attached,

Best

Peter Phibbs

**From:** Peter Phibbs <peter.phibbs@sydney.edu.au>  
**Sent:** Friday, 6 May 2022 11:40 AM  
**To:** Representation  
**Subject:** Changes to Planning Scheme - re short stay accommodation  
**Attachments:** Submission\_ShortStayAccommodation\_May2022.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Madam/Sir

This time my submission is attached.

Best

Peter Phibbs

**Professor Peter Phibbs**

Emeritus Professor, Henry Halloran Trust  
peter.phibbs@sydney.edu.au

Chief Executive Officer,  
City of Hobart, GPO Box 503,  
Hobart 7001

May 5<sup>th</sup> 2022

Dear Ms Grisby

**Re: Amendment PSA 22-1**

I am writing in support of the proposal to amend the Hobart Planning Scheme (PSA 22-1) in order to remove some forms of short stay accommodation from Hobart City residential zones.

I support the proposed amendment because I have formed the view after researching the issue of short stay accommodation for almost 10 years, that it is not possible for Hobart City to have a well-functioning rental market at the same time as having a deregulated short stay sector.

Whilst many supporters of short stay accommodation argue that the two markets (ie short stay and long term accommodation) are separate markets recent research which I have undertaken for Shelter Tasmania suggests that this is not the case. In this research we obtained (through an MOU process) a list of addresses of short stay accommodation dwellings in six suburbs: Sandy Bay, Hobart, North Hobart, West Hobart, South Hobart and New Town and entered them into a real estate website (propertyvalue.com.au) to establish whether a long-term rental history existed for the property.

In total, 47% of short-term rental properties also had a rental history from the long-term rental market shown on the propertyvalue.com.au site<sup>1</sup>.

This finding would suggest that the majority of the properties in the STR market in Hobart City<sup>2</sup> were previously in the longer-term rental market, and hence the increases in STR listings were likely to be a major reason why we can see the shrinking of the long-term rental market in Hobart City in the period 2016 to 2019 which placed upward pressure on rents.

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<sup>1</sup> Note that some of the STR properties from the CBOS list could not be identified from the propertyvalue.com.au site. This ranged from about 8 to about 18 percent of properties, depending on the suburb.

<sup>2</sup> It's a majority, after allowing for the relatively large proportion of self-managed properties in Hobart as reported by the 2016 ABS Census

I have also included some other elements of the research project for Shelter Tasmania through a series of Questions and Answers I previously prepared for Hobart City Councillors. I have attached them for your convenience.

I would also suggest that the proposed changes are consistent with both the objectives of the Hobart City Planning Scheme, the Objectives of the Resource Management and Planning System of Tasmania and the Southern Tasmanian Regional Land Use Strategy.

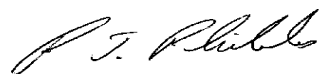
In terms of the Resource Management and Planning System of Tasmania a key objective is to “provide for the fair, orderly and sustainable use and development of air, land and water”.

- The proposed changes will be fairer because less long-term renters will be competing with short term tourists from across the world for their accommodation needs.
- It will be more orderly because we won't see sharp changes in long term rental stock as housing is converted into short term rentals
- It will be a more sustainable uses of resources because we will need less housing stock to support Hobart's growing population. At the moment the system is very inefficient in that we have many empty hotel rooms, many short term rentals unoccupied except on weekends and at the same time having many Tasmanian families without adequate accommodation.

The changes are also clearly in alignment with the Southern Tasmanian Regional Land Use Strategy which in SRD2 calls for ‘Manage residential growth for Greater Hobart on a whole of settlement basis and in a manner that balances the needs for greater sustainability, housing choice and affordability’

The results of the proposed changes will have clear affordability benefits because over time it will reduce the dwelling stock moving from the long term to the short term rental market, thereby increasing the vacancy rates and putting downward pressure on rents. It also reduces the pressure on greenfield sites by releasing more dwelling stock into infill housing rather than providing accommodation for tourists.

Yours sincerely



Peter Phibbs

Emeritus Professor.

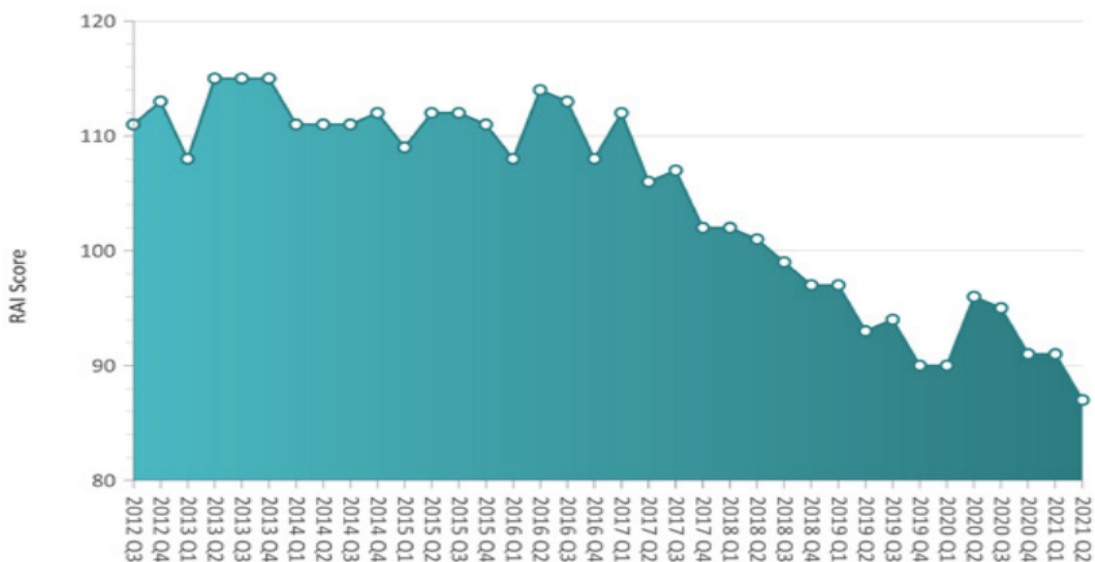
/Atta



## Questions and answers about the Hobart Rental Market and Short Term Rentals

### How are rental markets currently performing in Tasmania.

It is generally conceded that rents in Tasmania have become increasingly unaffordable. For example, the well respected Rental Affordability Index compiled by SGS Economics and Planning (2021) shows that rents have become increasingly unaffordable in both Greater Hobart and regional Tasmania. Their latest index for Greater Hobart is shown in the figure below. It demonstrates how affordability deteriorated from the beginning of 2017.



### Why have things got so much worse since 2017?

Two things have been happening. The demand for accommodation has increased as population growth has increased, while the total size of the private long term rental market between July 2016 and the end of 2019 seems to have shrunk in Greater Hobart and Hobart LGA. This is very different behaviour than other capital city housing markets who before COVID experienced solid private rental market growth.

Change in total rental bond holdings (from June 30 <sup>th</sup> the previous year)	Greater Hobart %	Hobart City LGA %	Melbourne %	Sydney %	Brisbane City %
June-2019	-1.4	-2.9	4.1	5.3	4.4
June-2018	-2.0	-2.9	4.0	2.6	7.2
June-2017	0.5	2.2	5.5	5.7	5.7

We measured the changes in the rental market using a public accessible data series from the Department of Justice that shows the monthly number of closed and new rental bonds from July 2016 which is hosted on the website [www.data.gov.au](http://www.data.gov.au)

### **What's that got to do with Short Term Rentals (STRs)**

The study suggests that the main but not the only reason that the Hobart rental markets shrunk in this period is because of the increased number of properties that have moved to short term listings from the long term rental market. Whilst clearly many STR dwellings will never have been rented in the long term rental market, enough of these dwellings have been removed from long term rentals to put downward pressure on long term rental supply. In total between July 2016 and the end of 2019, there was an increase in whole dwellings listed on AirBnB in Hobart City of 461 dwellings. During the same period we estimated that the long term rentals (measured by total rental bonds) in Hobart City decreased by about 280 dwellings.

### **But given the size of the Hobart City Rental market, surely the loss of a small number of rental dwellings won't have an impact on the rental market?**

Changes in rents are impacted by changes in the vacancy rate. Based on 2016 census data the size of the private long term rental market is about 6,500 dwellings. The vacancy rate is the number of vacant properties divided by 6500. So losing 100 rental dwellings can shift the vacancy rate from 2.5 % (where rents might be increasing in line with inflation) to about 1 % when the market is likely to experience double digit rental growth.

### **What has the research literature concluded about the impact of STRs on the housing market?**

Our review of the independent research literature shows that whilst results vary depending on the nature of the housing markets being examined the vast majority of independent studies describe how an increase in Short Term Rental activity generates an increase in rents and/or house prices.

### **Surely it's just a supply problem – we aren't building enough housing stock?**

This does not appear to be the case. Apart from a period when population growth increased in 2017 and 2018, Greater Hobart has been performing well on housing supply especially over recent years where supply of new dwellings has comfortably exceeded the demand (based on household formation models from an Australian Government housing agency, NHFIC). Note the large surpluses in the last two years as a result of the slower population growth rate due to COVID-19 and strong dwelling completions.

### **Comparing underlying demand for dwellings with net dwelling completions – Greater Hobart 2012-2021.**

	Population growth %	Underlying dwelling demand	Net dwelling completions	Surplus/Deficit
2012	0.6	440	886	446
2013	0.7	513	638	125
2014	0.9	660	608	-52
2015	0.9	660	807	147
2016	1.1	807	981	174
2017	1.5	1100	742	-358
2018	1.5	1100	1052	-48
2019	1.5	1100	1257	157
2020	1.1	807	1309	502
2021	na	700	1400	700

### **Other capital cities have short term rentals too and their rental markets are doing better than Hobart. Haven't some other issues generated the problems in the private rental market?**

The problem for Hobart is that it has much more STR as a proportion of its total private long term rental market than other cities (what researchers call STR density).

Location	AirBnB Density
<b>Greater Sydney</b>	<b>0.83%</b>
Sydney LGA	2.08%
<b>Greater Melbourne</b>	<b>1.25%</b>
Melbourne LGA	3.82%
<b>Greater Hobart</b>	<b>5.65%</b>
Hobart City LGA	9.33%

Estimates for December 2021

**Surely the number of STRs have stabilized so things can't get worse?**

Whilst COVID-19 and the lack of international students has pushed down the demand for STRs and hence listings in the COVID-19 era, evidence from other tourist areas of Australia things can get a lot worse. For example., in Byron Bay in northern NSW AirBnB density is currently approaching 50%.

**From:** Molly Taylor <mollywheelsofsteel@yahoo.com>  
**Sent:** Friday, 6 May 2022 11:56 AM  
**To:** Representation  
**Subject:** Short stay amendment.

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I am writing in relation to the Short Stay Rules amendment, proposed by the Hobart city council.

I fully support the Hobart City Councils proposal on the Short stay accomodation Amendments.

I believe this is a must.

I was on th Hobart city Concil Advisory committe for disability for years.

In my last few years there, I constantly was raising the issue of vacant premises in the city, and the tragedy of the annually growing homeless issues.

The housing accomodation crisis is just that.. A crisis.. actually a catastrophe.

These proposed amendment changes, will help to accomodate local people, and also those, who presently are living a life of rental uncertainty.

Living rough.

Dying.

Please consider the people of Tasmania first, and pass this amendment, to further free up rental accomodation to those who need it most.

It affects all sectors of the community, and with the increased cost of living, will become even greater.

Housing availability is closely linked with the tragic suicide rates by the homeless in Tasmania.

We dont get the statistics published, but we are all aware the numbers are high.

I also worked years ago at the RHH, and the numbers were high then, much higher now unfortunately.

These two situations are closely linked.

Please vote for the people of Tasmania,before greed.

I have been homeless on a few occasions.

Not from doing anything wrong.

If you haven't experienced it.. believe me, it is traumatic, and despairing.

We are also about to be getting an influx of people losing their homes with the mortgage interest rises.

Homelessness is only one situation away for everyone.

It could happen to you too.

What would you do if you lost your home..??

Please, give this situation your very serious consideration, to pass this proposed amendment on Short stay accomodation.

We must do all we can at a local level, to secure rentals for local people.

Kind regards.

Thankyou for your time and consideration.

Molly Taylor.

16/214harrington St.

Hobart.



**From:** jacqui stocks <projectfrauhaus@gmail.com>  
**Sent:** Friday, 6 May 2022 12:33 PM  
**To:** Representation  
**Subject:** short stay accomodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi,  
as someone who has felt the angst of looming homelessness, each time a landlord decides to sell, I think the council really need to regulate and minimize short stay accomodation.

Many gluttonous folk have fed off the airbnb nipple for long enough, including councillors from local governments. And then there's the gluttons on the govt migrant rental scheme.

When are we going to condemn this blatant greed thats destroying our communities?

Enough is enough.  
Reign these glutton in because they certainly wont do it of their own accord.

Please also do something about the 9 month leases, where people get kicked out over summer. Should be illegal.

Kind Regards  
Jacqui Stocks  
Co-founder  
Project Frauhaus  
0426221512

**From:** Anna Bateman <afsanalee@icloud.com>  
**Sent:** Friday, 6 May 2022 12:51 PM  
**To:** Representation  
**Subject:** Short Stay amendment

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I am writing in support of the short stay rules amendments requested by Hobart City Council. The short stay sector in greater Hobart has taken 10% of the rental housing market away from Hobartians, who currently can't find a home. The Anglicare Rental affordability snapshot for 2022, found that on one weekend in March, NOT A SINGLE rental property in the Hobart LGA was deemed affordable for a person on a pension. This would extend to anyone on a lower income than \$36,000, including casual waged single parents, youth, students, people with disabilities, carers and many aged residents. Given that Tasmania has the 2nd highest national rate of people living on welfare, some of the lowest wages in the country, and is the 4th most profitable buyers market globally, to add whole house short stays to the mix at this time is a complete dereliction of Government to provide or preserve the U.N sanctioned human right of adequate and secure, affordable housing. The growth of investor led short stay property acquisition will NOT self regulate, as has been evidenced in other jurisdictions worldwide. Byron Bay has lost 50% of its rentals to Air bnb, and towns like Derby, St Helens and other sought after tourist locations will follow suit, and are already feeling impacts- with tourism and local industry workers struggling to find somewhere to live. Let's not allow our state to have ghost town suburbs of for-profit home hoarding, whilst locals sleep rough, or leave. Other cities across the world have been forced to regulate the short stay sector, for exactly the reasons we are now having to regulate it in Hobart, and regulate, we must. I fully support the motion by HCC to do this, to request an end to short stay whole houses in the local government area of Hobart, and support the other requested amendments to short stay legislation put forward by Hobart City Council. Please think of local people first. We must do all we can to provide housing at a local level, and preserve access to rentals. Regulating the short stay sector is one thing that will make a tangible and quantifiable difference to fixing the problems of accessing housing- that the cohorts I represent experience every day. These problems are dire and worsening and action to stem all unintended flow of available homes into private visitor accommodation must be on the table. I commend HCC for this recommendation, and I hope this motion passes into action . With regards,  
Anna Bateman  
3/12 Paige Court Warrane  
TAS 7018



**From:** Katherine Cossyvas <katherine.cossyvas@airbnb.com>  
**Sent:** Friday, 6 May 2022 1:39 PM  
**To:** Representation  
**Cc:** Michael Crosby  
**Subject:** Airbnb Submission: Proposed Amendment PSA-22-1 - Short Stay Accommodation  
**Attachments:** Airbnb Submission - Hobart City Council - PSA-22-1.pdf; Airbnb Submission - Hobart City Council - PSA-22-1.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Chief Executive Officer,

Please find **attached** Airbnb's submission to Proposed Amendment PSA-22-1 on Short Stay Accommodation.

Regards,  
Katherine



Katherine Cossyvas  
Public Policy - Australia & New Zealand  
She/her

Airbnb acknowledges the cultural Custodians and Traditional Owners of the lands and waterways on which we live, work and travel.



6 May 2022

Ms Kelly Grigsby  
Chief Executive Officer  
City of Hobart  
GPO Box 503  
Hobart Tasmania 7001

**By email:** [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

Dear Ms Grigsby

Thank you for the opportunity to comment on the City of Hobart's Proposed Amendment (PSA-22-1) to the Hobart Interim Planning Scheme 2015.

In this submission we have sought to provide a short background about Airbnb and our community, together with specific concerns about the proposed amendment.

### **Executive Summary**

- Airbnb's community continues to support the growth of the visitor economy in Hobart, by providing more choice of accommodation for consumers across a variety of price points.
- Our community of Hosts and guests are important contributors to the Tasmanian economy, supporting ancillary services in towns and regions. The latest pre-pandemic research shows that in one year alone, Airbnb guests who stayed in Tasmania spent \$353 million, which supported 3,200 jobs across the state. In the same year, Airbnb guests in Hobart contributed \$113 million to the local economy and supported 900 jobs.
- Our platform plays a crucial role in helping people remain in their homes and communities by providing them with the ability to supplement their income by turning their greatest asset – their home – into a source of revenue that assists with cost of living pressures.
- The proposed amendment to the Hobart Interim Planning Scheme 2015 will place Hobart and Tasmania on a vastly unequal footing and ultimately hurt guests, local businesses and communities across the city by reducing choice, availability and affordability of accommodation.
- Hobart stands to lose affordable, family-appropriate accommodation options and this will reduce opportunities for intergenerational travel at a time when the rising cost of living is placing Australian households under considerable strain.
- Airbnb considers that housing availability and affordability is a complex public policy issue and any mature and prudent debate must look at the real drivers, including broader

macroeconomic factors, demographic changes, approval rates for new housing developments and policies across Commonwealth, State and local governments.

- The focus must be on growing the supply of both social and affordable housing to ensure Hobart can grow sustainably and with the future in mind.
- The proposed amendment artificially constrains the market and is likely to have a number of unintended consequences including inflating the prices of properties that already have permits and creating a rush on new permits.
- Airbnb continues to support the Tasmanian Government's statewide regulatory framework for short-stay accommodation and is committed to continuing our cooperation with all levels of government through data and information sharing to ensure policy solutions are informed by sound evidence.

## **About Airbnb**

Airbnb was born in 2007 when two Hosts welcomed three guests to their San Francisco home, and has since grown to 4 million Hosts who have welcomed more than 1 billion guest arrivals across over 220 countries and regions. Travel on Airbnb keeps more of the financial benefits of tourism with the people and places that make it happen. Airbnb has generated billions of dollars in earnings for Hosts, 90 percent of whom are individuals listing the homes in which they live. Among Hosts who report their gender, more than half are women, and one in five employed Hosts are either teachers or healthcare workers. In 2019, Airbnb directly supported 300,000 jobs in just 30 destinations, averaging nine jobs for every 1,000 guest arrivals. Travel on Airbnb also has generated more than \$4 billion in tax revenue around the world. Airbnb has helped advance more than 1,000 regulatory frameworks for short-term rentals, including in 80% of our top 200 geographies. In late 2020, to support our continued expansion and diversification, we launched the City Portal to provide governments with a one-stop shop that supports data sharing and compliance with local registration rules. We continue to invest in innovations and tools to support our ongoing work with governments around the world to advance travel that best serves communities.

## **The Airbnb community in Tasmania**

Airbnb's community has a strong track record of growing the visitor economy in Hobart and Tasmania, providing more choice of accommodation for consumers in more locations across a variety of price points. In the 12 months ending 31 March 2022, our Host community welcomed almost 80,000 guests in the Hobart City Council area.<sup>1</sup> These are almost entirely trips taken by Australians, with little to no international travel throughout 2021, owing to border closures.

Airbnb has a large community of Hosts in Hobart for whom sharing their home is now part of their lifestyle. The overwhelming majority of our Hosts are 'mum and dad' operators looking to supplement their income or subsidise their own travel, with many hit hard by the pandemic and

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<sup>1</sup> Internal Airbnb data as at 1 April 2022.

related border closures. Importantly, the sharing economy helps build resilient communities where locals can create supplementary income, and robust economies that are supported by increased visitation and spending by Airbnb guests – often in areas that do not traditionally benefit from the tourist dollar. As the Council would be well aware, tourism is playing a crucial role in Hobart and Tasmania’s economic recovery; Airbnb helps empower communities to share in the benefits of tourism and welcome new visitors to their neighbourhoods.

Prior to the Covid-19 pandemic, the Tasmanian Government delivered a proportionate and workable regulatory framework for short-stay accommodation in the state. Subsequently, Airbnb guests in Hobart contributed \$113 million to the local economy and support for 900 jobs.<sup>2</sup> Meanwhile, our guest community spent \$353 million in Tasmania overall, supporting 3,200 jobs across the state and contributing \$280 million to Gross State Product.<sup>3</sup> Any consideration of changes to short-stay accommodation in Hobart must consider the flow on effects to small businesses and those who are employed by them.

In addition to visitor spending, the home sharing economy is supporting the growth of ancillary services and the creation of local jobs — such as domestic cleaning, gardening and property management — facilitated by over one third of surveyed hosts (37 percent) on Airbnb in Australia who prefer to engage professional services to manage their listings and bookings.<sup>4</sup> The economic activity created by Airbnb supports these businesses, including those in regional areas that might not otherwise benefit from tourism and increased visitation. Alongside jobs in restaurants, cafes, and retail shops, the combined value of wages paid to workers in these businesses across Australia in 2019 was \$3.9 billion, according to Oxford Economics.<sup>5</sup> This highlights the immense value of short-stay accommodation to the Hobart City Council area and the economic opportunities it provides for Hosts, local businesses and the wider community.

Importantly, Airbnb also plays a crucial role in helping people remain in their homes and communities by providing them with the ability to supplement their income. In a survey of Australian Hosts on Airbnb in 2021, a third of respondents said the primary reason they started hosting was to ‘make ends meet’.<sup>6</sup> In turn, these Hosts help drive economic growth and job creation, with many local businesses relying on the valuable tourism dollars spent by Airbnb guests. Moreover, the supplemental income earned through home sharing empowers Tasmanian women and older or retired persons to remain in their homes and communities — 67 percent of Airbnb Hosts in Tasmania are women and over 30 percent of Hosts are 60 years or older.<sup>7</sup> As the

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cost of living increases, home sharing provides an economic lifeline for everyday Tasmanians in helping to make ends meet.

## **Airbnb and the housing market**

Housing is a complex public policy issue and Airbnb welcomes the opportunity to place short-stay accommodation into appropriate context. Given the range of factors influencing the market, both in Hobart and Tasmania more broadly, any mature and prudent debate must examine the real drivers of availability and affordability, including market factors such as demographic changes, economic circumstances of households, rising construction costs, and policies across Commonwealth, State and local governments.

Overall, Airbnb's impact on the overall housing market is minimal. [Official, industry-wide data](#) published by the Tasmanian Government, and provided by booking platforms under the statewide regulatory framework, shows that in the local government areas of Brighton (2), Clarence (120), Derwent Valley (38), Glenorchy (44), Hobart (420), Kingborough (200) and Sorell (60) there were only 884 non-primary residences used for short-stay accommodation in Q3 2021.<sup>8</sup> To put this into perspective, the 2016 Census recorded 8,800 unoccupied private dwellings in Greater Hobart — in other words, there were 10 times more vacant dwellings in Greater Hobart than non-primary homes used for short-stay accommodation. Meanwhile, non-primary residences represent less than one per cent of the total housing stock in Greater Hobart, with 99,009 private dwellings in the area.<sup>9</sup>

As of March 31, 2022, the overwhelming majority (over 80%) of Hosts in the Hobart City Council area share just one property.<sup>10</sup> For many Hosts, the properties they choose to share on platforms like Airbnb are their own homes, holiday homes, city homes or ancillary dwellings that might otherwise remain empty if not used for short-stay accommodation. Crucially, these are not properties that will simply move to the long-term rental market should a blanket ban on new permits be imposed.

A [report](#) into the economic impact of short-term rental accommodation in Byron Bay – a comparable market for its size with high visitation by domestic and international tourists – found that the majority of Hosts would not shift their properties to the long-term rental market if hosting opportunities were constrained by regulation through zoning or night caps. A survey of local Hosts showed that any increase in properties becoming available on the long-term market as a result of short-stay policies was 'negligible'. It also noted that in considering whether to shift their property to the long-term rental market, not all Hosts are seeking a minimum yield 'as holiday properties for many will be an emotional decision motivated by enjoyment, not investment or business'. The same may be said for Hosts in the Hobart local council area, as we know the

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reasons for sharing their properties are varied and a ban on new permits will not simply shift properties to the long-term rental market..

Similarly, a [report](#) prepared for Queenstown Lakes District Council in New Zealand by a panel of independent commissioners found that the issue of long-term rental availability and affordability pointed to a combination of factors. It was noted that the effect of short term visitor accommodation, if any, would be small and had only ‘marginal influence on the overall problem of long term rental housing availability and affordability in the District’.<sup>11</sup> The panel formed the view based on evidence provided by a range of experts and stakeholders in the context of hearings and submissions made to a public consultation process. The panel’s findings reiterate the complexity of housing affordability and availability as a public policy issue and the strong need to consider the various influencing factors before proposing to restrict short-stay accommodation.

To help alleviate housing pressures and encourage longer-term solutions, Airbnb urges the City of Hobart to consider opportunities to grow the supply of new social and affordable housing in the local area. Supply is the key to driving up vacancy rates for residential dwellings in the area. In March 2022, the Tasmanian Government acknowledged that ‘the only way to address rising house and rental prices is to increase supply’, when they announced a ten-year, \$1.5bn housing package to deliver 10,000 new dwellings. A ban on new short-stay accommodation permits is not the answer to housing challenges in Hobart and will not immediately unlock affordable housing in the council area. As mentioned, housing is a complex public policy issue and the focus must be on growing the supply of both social and affordable housing to ensure Hobart can grow sustainably and with the future in mind.

On this front, encouragingly, [official data from the Australian Bureau of Statistics](#) shows an increase in residential dwelling approvals across Tasmania in 2021. We consider these positive steps forward in building supply and ensuring that housing stock is keeping pace with population growth and the needs of the community. By comparison, shorter-term solutions, such as that being proposed by Hobart City Council, will not deliver meaningful, long-term benefits for the community in addressing housing issues.

## Scraped data

Airbnb notes that Hobart City Council seeks to rely on scraped data to estimate the impact of short-stay accommodation on the housing market in Hobart. The Hobart City Council’s *Social Inclusion Dashboard* uses short-stay data sourced from a third-party service that scrapes information from online booking platforms and paints a misleading picture of the sector. Booking platforms such as Airbnb share data with the Tasmanian Government quarterly under the current statewide regulatory framework to support common sense policy outcomes and avoid the need for reliance upon unreliable data.

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<sup>11</sup> Queenstown Lakes District Council, 2019, [Report and Recommendations of Independent Commissioners Regarding Chapters 25, 29, 31, 38, and Visitor Accommodation](#), pp.21.

Scraped data has a number of serious flaws, particularly in the way that short-stay data is represented. For example, an 'entire home listing' is not always equivalent to a stand-alone dwelling and data scraped by third parties simply cannot make these distinctions. Entire homes could be a granny flat or self-contained space adjacent to or within an existing house. It will not always be the sort of space that policy-makers would regard as a dwelling available to rent on a long-term basis to a tenant in the traditional sense. Rather, it is space which is used from time-to-time by visiting friends or family. In data sets scraped by third-parties, an individual or family's primary place of residence will also appear as an entire home listing, even when it is only listed for a short period, including while they are travelling and choose to list their home on Airbnb for the period they are away.

In addition, scraped data does not reflect that properties may become available for short-stay accommodation for only a few weeks or months per year. These properties may shift back onto the long term rental market periodically, yet could still be represented as homes or rooms used exclusively for short stays, thereby overstating the scale and impact in the local community. Similarly, Hosts often cross-list their properties on multiple booking platforms and may be represented multiple times in analyses that rely on unverified data. These nuances are not accounted for in data sets scraped from our website or that of other booking platforms and we again express our concern on Hobart City Council's reliance on this information in its decision-making processes.

Airbnb notes that in developing its short-stay accommodation policies, the City of Hobart has relied upon published research that has utilised scraped data from third-party providers in conducting their analysis. For the reasons outlined above, such data cannot be trusted insofar as it does not provide an accurate picture of the entire short-stay accommodation market. Council's decisions must be guided by the best available data to ensure it maximises the benefit for Hobartians and avoids any unintended consequences. In this respect, we are concerned that the Council has made policy decisions based on speculative data and would encourage the use of the [official data](#) collected from all major platforms and published by the Tasmanian Government. Airbnb stands ready, willing and able to work with Hobart City Council to explore reform opportunities guided by the best possible evidence and have on multiple occasions offered to provide reliable data to inform these processes.

## **Proposed Amendment to the Local Planning Scheme 2015: PSA-22-1**

Airbnb welcomes the opportunity to comment on the proposed amendment to the Local Planning Scheme 2015 and highlight the potential impacts on our Host and guest community.

Airbnb's community continues to support the growth of the visitor economy in Hobart, by providing more choice of accommodation for consumers across a variety of price points. Any regulation of short-stay accommodation must be fair, fit-for-purpose and backed by sound

evidence, and we are committed to working with governments and local councils on tangible policy solutions that deliver positive outcomes for all stakeholders. Airbnb has supported the development of thousands of policy frameworks around the world and can bring practical solutions and learnings from where we've helped advance regulatory settings, including other Australian states and local government areas.

We are concerned that Hobart City Council's proposed ban on short-stay accommodation in residential areas will have adverse impacts on the local community, hurting Hosts, guests and local businesses by reducing choice, availability and affordability of accommodation in Hobart. Further, the policy itself does not adequately address the issues that Council is attempting to solve. Airbnb advocates for rules that are fair, sensible and which strike a balance so that everyone can share in the benefits of tourism, and are adaptive to the changing ways people are living and working with the rise of flexible and hybrid work arrangements.

A ban on entire home short-stay accommodation will severely disadvantage everyday Hobartians at a time when the rising cost of living is placing Tasmanian households under significant financial strain. Crucially, it will put holidaying and hosting further out of reach for many Australians, with a range of unintended consequences, as outlined below.

### **Fewer, less affordable accommodation options**

Airbnb notes that the short-stay accommodation market is not static. The properties available change and churn depending on the wishes of the Host, changes in ownership, the time of year and tourism peaks, such as festivals and major events. The fact that a property has a short-stay accommodation permit, does not necessarily mean that the property is, in fact, currently available as accommodation. Given the flexibility of the market, a ban on permits will not lead to a ceiling on a short-stay but potentially a reduction in the number of properties available over time.

Imposing controls on where short-stay accommodation can and cannot operate within the community creates an uneven playing field and reduces the range of accommodation options in Hobart. In order to flourish, the city needs a vibrant mix of accommodation types that offer visitors more choice, particularly for families on a budget. The [Report to Council](#) suggests that the proposed amendment would result in more visitors using hotel or serviced accommodation and greater local economic benefit. However, regulation should not be about one type of accommodation against another, but rather growing the tourism pie for the benefit of the entire community. Fewer short-stay properties does not mean that guests will simply move to traditional accommodation providers. Instead, the proposed ban risks diverting tourists and spending to neighbouring council areas with less restrictive rules and requirements, placing the Hobart visitor economy at a serious competitive disadvantage.

Our platform provides everyday people with a range of suitable options within their budget and allows many to travel who might not otherwise be able to. For many families, staying in short-stay accommodation is better suited to their needs as they can access kitchen facilities, outdoor



spaces and multiple bedrooms when travelling with children and extended family members. These opportunities are not typically available in traditional accommodation or are prohibitively expensive for the average family. We know of many Hobart Hosts and guests who utilise short-stay accommodation for intergenerational family holidays or to stay close to family and friends when visiting from regional areas. A ban on the issuance of new permits in residential areas, where larger family homes are generally available, will significantly reduce accommodation options and restrict opportunities for family and group travel.

The proposed amendment will also limit the City of Hobart's ability to accommodate interstate and international visitors when major events, conferences and festivals come to town. The surge capacity, or elastic supply, that the Airbnb community can provide creates opportunities for attracting and hosting major events in cities and regional towns. With a ban on short-stay accommodation in residential areas in place, Hosts in Hobart will lose the ability to quickly and easily share their homes when demand for accommodation surges. This will have significant negative impacts on popular, major events that take place annually in Hobart, such as Dark Mofo and Taste of Summer. Hosts and local businesses will ultimately lose out, with guests deciding to stay in other areas with more affordable options available.

Reducing supply will inevitably lead to less affordable accommodation options in Hobart, particularly in residential areas that are not well serviced by traditional accommodation. Families will bear the brunt of this, as they face difficulties finding accommodation to suit their needs and within their budget. Our platform plays an important role in democratising travel, allowing Australians to explore parts of the country that might not otherwise be financially feasible. Higher accommodation costs will force many to travel to other more affordable destinations or simply decide not to travel at all.

The Council's proposal should not be seen as a mere cap on the existing number of available permits for unhosted short-stay accommodation. Rather, it is a handbrake on the visitor economy in Hobart and its ability to evolve and respond to future consumer demand and preferences. This will place Hobart at a disadvantage to other jurisdictions, where there is appropriate recognition of changing consumer habits and desire to embrace innovative, technological solutions.

### **Myriad use-cases for short-stay accommodation**

Disappointingly, the proposed ban on short-stay accommodation neglects the myriad reasons that Hosts and guests utilise this vital form of accommodation and the impacts on everyday Tasmanians. This includes, but is not limited to, accessing essential health care, education or work opportunities, to attend major events or conferences, during emergencies, and visiting friends and family from regional and remote areas of the state. The use of short-stay for non-tourism reasons is not a new phenomena: short-stay properties have existed for decades and technology has enabled Hosts to utilise the sharing economy to monetise their spaces and

help make ends meet. We know that a ban on new permits will have adverse impacts on everyday citizens who rely heavily on short-stay to live, work and travel on a budget.

For example, we know of essential workers (such as nurses and medical professionals) who live outside of Hobart and use short-stay accommodation to stay in close proximity to their workplaces when on night shift, and others who use short-stay accommodation to be closer to medical facilities when seeking regular treatment or care, whether or themselves or vulnerable family members. We also know of tradespeople in the construction industry that utilise short-stay accommodation to live whilst working on a project away from their primary home. The cost of staying in, and availability of, traditional accommodation during these short, but regular stays is prohibitive for many and platforms like Airbnb provide cost effective options that suit their particular needs.

Data indicates that the accommodation needs of people are changing and a ban on the issuance of new permits in residential areas would not support the growing demand for short-stay accommodation in Tasmania. According to Tourism Tasmania's [Tourism Snapshot 2021](#), the pandemic has influenced a shift in preferred accommodation styles and trip lengths across the state. Nights spent in 'self-contained accommodation' has tripled since 2019 and the number of nights stayed has increased from approximately three nights to a week or more in 2021.<sup>12</sup>

This data mirrors trends we are seeing on our own platform. Over the last two years, Airbnb has seen average trip length increase by approximately 15%, with stays of more than 7 days now representing nearly half of all gross nights booked.<sup>13</sup> It indicates a shift in the way people are living, working and travelling and the need for regulatory frameworks to be flexible and agile in adequately reflecting this. The reason our platform has been able to respond to this changing world of travel is because our model is inherently adaptable. We have Airbnb Hosts all over the world who offer nearly every type of home in nearly every community around the world. These homes accommodate all types of travel and the diverse needs of guests, highlighting the importance of having regulatory settings that are future-proof and adaptive.

Overall, the proposed ban on short-stay accommodation fails to appreciate the many reasons that Hosts and guests utilise short-stay accommodation and turns the tap off on vital forms of accommodation that supports the local community. As noted previously, for many Hosts, their short-stay properties are holiday homes or city homes that would otherwise remain empty if not used for accommodation and will not become available on the long-term property market. The ban does not meaningfully address the issues that Council is attempting to solve, but instead disadvantages the entire community by limiting opportunities to grow the local visitor economy.

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<sup>12</sup> Tourism Tasmania, '[Tasmanian Tourism Snapshot: Year ending December 2021](#)', pp. 6.

<sup>13</sup> Airbnb data, [Shareholder letter Q1 2022](#).

## **Reverse impact on property values and permit approvals**

Airbnb appreciates that existing short-stay permit holders will not be affected by the proposed amendment to the local planning scheme. However, we are concerned that the ban on new permits is likely to have a number of unintended consequences, including on property prices and permit applications. Our platform provides unique accommodation options at a variety of price points and reduced supply does not mean that demand will simply dissipate with a ban on the issuance of new permits.

In fact, the ban risks undermining the Council's policy objectives by potentially increasing the value of properties that already have a short-stay permit. Limits on the number of properties that can operate short-stay accommodation places a premium on those that already have permitted use rights and may increase demand due to the potential economic opportunities that the permit provides. While Airbnb recognises the difficulty in predicting the precise impact of this ban in this regard, any increases in individual property prices can set broader pricing trends and expectations, including on rental affordability. Airbnb and other commentators have previously warned Hobart City Council of this potentially paradoxical outcome should a ban on permits be pursued and again urge the Council to carefully consider this issue to avoid worsening the impacts on the local community.

Further, we are also conscious that the proposed amendment will create a rush on new permit applications in the intervening period between public consultation and the ultimate decision. We note that the Report to Council estimates that, if pursued, amendments to the Hobart Local Planning Scheme will be finalised towards the end of 2022, signalling a considerable window within which local Hobartians can obtain a permit. We note that additional permit applications may also have the effect of delaying the myriad of other planning applications the Council must consider. This is highly likely to have significant resourcing implications and, in turn, create delay for any property owners in the Hobart local council that are seeking approvals for any other purpose. Airbnb reasonably expects that for the foreseeable future, the Council will continue issuing approvals for short-term rental accommodation in line with the existing processes and make decisions based on the policy as it currently stands.

## **Conclusion**

Airbnb welcomes any opportunity to work constructively with the City of Hobart and other stakeholders to support the development of evidence-based policy settings that build housing supply, help address the unique stressors that come with population change, and ensure that the visitor economy continues to contribute to the economic well-being of Hobart.

At the same time, we stress that the influence of Airbnb's community of Hosts and guests, are infinitesimal when compared to the other many factors that impact the broader housing market in Australia. The nature of our role in the Hobart landscape is such that we assist in growing the

potential of existing dwellings and economically empower ordinary Tasmanians to share their home and offset the cost of their housing through hosting.

Crucially, Airbnb notes that the Council's proposal is extremely unlikely to have a substantive impact on the availability of affordable rental housing in the City of Hobart.

Thank you again for the opportunity to make a submission to this process.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Mcrosby', with a stylized, cursive script.

Michael Crosby  
Public Policy Manager, ANZ  
Airbnb  
[michael.crosby@airbnb.com](mailto:michael.crosby@airbnb.com)



6 May 2022

Ms Kelly Grigsby  
Chief Executive Officer  
City of Hobart  
GPO Box 503  
Hobart Tasmania 7001

**By email:** [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

Dear Ms Grigsby

Thank you for the opportunity to comment on the City of Hobart's Proposed Amendment (PSA-22-1) to the Hobart Interim Planning Scheme 2015.

In this submission we have sought to provide a short background about Airbnb and our community, together with specific concerns about the proposed amendment.

### **Executive Summary**

- Airbnb's community continues to support the growth of the visitor economy in Hobart, by providing more choice of accommodation for consumers across a variety of price points.
- Our community of Hosts and guests are important contributors to the Tasmanian economy, supporting ancillary services in towns and regions. The latest pre-pandemic research shows that in one year alone, Airbnb guests who stayed in Tasmania spent \$353 million, which supported 3,200 jobs across the state. In the same year, Airbnb guests in Hobart contributed \$113 million to the local economy and supported 900 jobs.
- Our platform plays a crucial role in helping people remain in their homes and communities by providing them with the ability to supplement their income by turning their greatest asset – their home – into a source of revenue that assists with cost of living pressures.
- The proposed amendment to the Hobart Interim Planning Scheme 2015 will place Hobart and Tasmania on a vastly unequal footing and ultimately hurt guests, local businesses and communities across the city by reducing choice, availability and affordability of accommodation.
- Hobart stands to lose affordable, family-appropriate accommodation options and this will reduce opportunities for intergenerational travel at a time when the rising cost of living is placing Australian households under considerable strain.
- Airbnb considers that housing availability and affordability is a complex public policy issue and any mature and prudent debate must look at the real drivers, including broader

macroeconomic factors, demographic changes, approval rates for new housing developments and policies across Commonwealth, State and local governments.

- The focus must be on growing the supply of both social and affordable housing to ensure Hobart can grow sustainably and with the future in mind.
- The proposed amendment artificially constrains the market and is likely to have a number of unintended consequences including inflating the prices of properties that already have permits and creating a rush on new permits.
- Airbnb continues to support the Tasmanian Government's statewide regulatory framework for short-stay accommodation and is committed to continuing our cooperation with all levels of government through data and information sharing to ensure policy solutions are informed by sound evidence.

## **About Airbnb**

Airbnb was born in 2007 when two Hosts welcomed three guests to their San Francisco home, and has since grown to 4 million Hosts who have welcomed more than 1 billion guest arrivals across over 220 countries and regions. Travel on Airbnb keeps more of the financial benefits of tourism with the people and places that make it happen. Airbnb has generated billions of dollars in earnings for Hosts, 90 percent of whom are individuals listing the homes in which they live. Among Hosts who report their gender, more than half are women, and one in five employed Hosts are either teachers or healthcare workers. In 2019, Airbnb directly supported 300,000 jobs in just 30 destinations, averaging nine jobs for every 1,000 guest arrivals. Travel on Airbnb also has generated more than \$4 billion in tax revenue around the world. Airbnb has helped advance more than 1,000 regulatory frameworks for short-term rentals, including in 80% of our top 200 geographies. In late 2020, to support our continued expansion and diversification, we launched the City Portal to provide governments with a one-stop shop that supports data sharing and compliance with local registration rules. We continue to invest in innovations and tools to support our ongoing work with governments around the world to advance travel that best serves communities.

## **The Airbnb community in Tasmania**

Airbnb's community has a strong track record of growing the visitor economy in Hobart and Tasmania, providing more choice of accommodation for consumers in more locations across a variety of price points. In the 12 months ending 31 March 2022, our Host community welcomed almost 80,000 guests in the Hobart City Council area.<sup>1</sup> These are almost entirely trips taken by Australians, with little to no international travel throughout 2021, owing to border closures.

Airbnb has a large community of Hosts in Hobart for whom sharing their home is now part of their lifestyle. The overwhelming majority of our Hosts are 'mum and dad' operators looking to supplement their income or subsidise their own travel, with many hit hard by the pandemic and

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<sup>1</sup> Internal Airbnb data as at 1 April 2022.

related border closures. Importantly, the sharing economy helps build resilient communities where locals can create supplementary income, and robust economies that are supported by increased visitation and spending by Airbnb guests – often in areas that do not traditionally benefit from the tourist dollar. As the Council would be well aware, tourism is playing a crucial role in Hobart and Tasmania’s economic recovery; Airbnb helps empower communities to share in the benefits of tourism and welcome new visitors to their neighbourhoods.

Prior to the Covid-19 pandemic, the Tasmanian Government delivered a proportionate and workable regulatory framework for short-stay accommodation in the state. Subsequently, Airbnb guests in Hobart contributed \$113 million to the local economy and support for 900 jobs.<sup>2</sup> Meanwhile, our guest community spent \$353 million in Tasmania overall, supporting 3,200 jobs across the state and contributing \$280 million to Gross State Product.<sup>3</sup> Any consideration of changes to short-stay accommodation in Hobart must consider the flow on effects to small businesses and those who are employed by them.

In addition to visitor spending, the home sharing economy is supporting the growth of ancillary services and the creation of local jobs — such as domestic cleaning, gardening and property management — facilitated by over one third of surveyed hosts (37 percent) on Airbnb in Australia who prefer to engage professional services to manage their listings and bookings.<sup>4</sup> The economic activity created by Airbnb supports these businesses, including those in regional areas that might not otherwise benefit from tourism and increased visitation. Alongside jobs in restaurants, cafes, and retail shops, the combined value of wages paid to workers in these businesses across Australia in 2019 was \$3.9 billion, according to Oxford Economics.<sup>5</sup> This highlights the immense value of short-stay accommodation to the Hobart City Council area and the economic opportunities it provides for Hosts, local businesses and the wider community.

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<sup>10</sup> Internal Airbnb as at 1 April 2022.



reasons for sharing their properties are varied and a ban on new permits will not simply shift properties to the long-term rental market..

Similarly, a [report](#) prepared for Queenstown Lakes District Council in New Zealand by a panel of independent commissioners found that the issue of long-term rental availability and affordability pointed to a combination of factors. It was noted that the effect of short term visitor accommodation, if any, would be small and had only ‘marginal influence on the overall problem of long term rental housing availability and affordability in the District’.<sup>11</sup> The panel formed the view based on evidence provided by a range of experts and stakeholders in the context of hearings and submissions made to a public consultation process. The panel’s findings reiterate the complexity of housing affordability and availability as a public policy issue and the strong need to consider the various influencing factors before proposing to restrict short-stay accommodation.

To help alleviate housing pressures and encourage longer-term solutions, Airbnb urges the City of Hobart to consider opportunities to grow the supply of new social and affordable housing in the local area. Supply is the key to driving up vacancy rates for residential dwellings in the area. In March 2022, the Tasmanian Government acknowledged that ‘the only way to address rising house and rental prices is to increase supply’, when they announced a ten-year, \$1.5bn housing package to deliver 10,000 new dwellings. A ban on new short-stay accommodation permits is not the answer to housing challenges in Hobart and will not immediately unlock affordable housing in the council area. As mentioned, housing is a complex public policy issue and the focus must be on growing the supply of both social and affordable housing to ensure Hobart can grow sustainably and with the future in mind.

On this front, encouragingly, [official data from the Australian Bureau of Statistics](#) shows an increase in residential dwelling approvals across Tasmania in 2021. We consider these positive steps forward in building supply and ensuring that housing stock is keeping pace with population growth and the needs of the community. By comparison, shorter-term solutions, such as that being proposed by Hobart City Council, will not deliver meaningful, long-term benefits for the community in addressing housing issues.

## Scraped data

Airbnb notes that Hobart City Council seeks to rely on scraped data to estimate the impact of short-stay accommodation on the housing market in Hobart. The Hobart City Council’s *Social Inclusion Dashboard* uses short-stay data sourced from a third-party service that scrapes information from online booking platforms and paints a misleading picture of the sector. Booking platforms such as Airbnb share data with the Tasmanian Government quarterly under the current statewide regulatory framework to support common sense policy outcomes and avoid the need for reliance upon unreliable data.

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<sup>11</sup> Queenstown Lakes District Council, 2019, [Report and Recommendations of Independent Commissioners Regarding Chapters 25, 29, 31, 38, and Visitor Accommodation](#), pp.21.

Scraped data has a number of serious flaws, particularly in the way that short-stay data is represented. For example, an ‘entire home listing’ is not always equivalent to a stand-alone dwelling and data scraped by third parties simply cannot make these distinctions. Entire homes could be a granny flat or self-contained space adjacent to or within an existing house. It will not always be the sort of space that policy-makers would regard as a dwelling available to rent on a long-term basis to a tenant in the traditional sense. Rather, it is space which is used from time-to-time by visiting friends or family. In data sets scraped by third-parties, an individual or family’s primary place of residence will also appear as an entire home listing, even when it is only listed for a short period, including while they are travelling and choose to list their home on Airbnb for the period they are away.

In addition, scraped data does not reflect that properties may become available for short-stay accommodation for only a few weeks or months per year. These properties may shift back onto the long term rental market periodically, yet could still be represented as homes or rooms used exclusively for short stays, thereby overstating the scale and impact in the local community. Similarly, Hosts often cross-list their properties on multiple booking platforms and may be represented multiple times in analyses that rely on unverified data. These nuances are not accounted for in data sets scraped from our website or that of other booking platforms and we again express our concern on Hobart City Council’s reliance on this information in its decision-making processes.

Airbnb notes that in developing its short-stay accommodation policies, the City of Hobart has relied upon published research that has utilised scraped data from third-party providers in conducting their analysis. For the reasons outlined above, such data cannot be trusted insofar as it does not provide an accurate picture of the entire short-stay accommodation market. Council’s decisions must be guided by the best available data to ensure it maximises the benefit for Hobartians and avoids any unintended consequences. In this respect, we are concerned that the Council has made policy decisions based on speculative data and would encourage the use of the [official data](#) collected from all major platforms and published by the Tasmanian Government. Airbnb stands ready, willing and able to work with Hobart City Council to explore reform opportunities guided by the best possible evidence and have on multiple occasions offered to provide reliable data to inform these processes.

## **Proposed Amendment to the Local Planning Scheme 2015: PSA-22-1**

Airbnb welcomes the opportunity to comment on the proposed amendment to the Local Planning Scheme 2015 and highlight the potential impacts on our Host and guest community.

Airbnb’s community continues to support the growth of the visitor economy in Hobart, by providing more choice of accommodation for consumers across a variety of price points. Any regulation of short-stay accommodation must be fair, fit-for-purpose and backed by sound

evidence, and we are committed to working with governments and local councils on tangible policy solutions that deliver positive outcomes for all stakeholders. Airbnb has supported the development of thousands of policy frameworks around the world and can bring practical solutions and learnings from where we've helped advance regulatory settings, including other Australian states and local government areas.

We are concerned that Hobart City Council's proposed ban on short-stay accommodation in residential areas will have adverse impacts on the local community, hurting Hosts, guests and local businesses by reducing choice, availability and affordability of accommodation in Hobart. Further, the policy itself does not adequately address the issues that Council is attempting to solve. Airbnb advocates for rules that are fair, sensible and which strike a balance so that everyone can share in the benefits of tourism, and are adaptive to the changing ways people are living and working with the rise of flexible and hybrid work arrangements.

A ban on entire home short-stay accommodation will severely disadvantage everyday Hobartians at a time when the rising cost of living is placing Tasmanian households under significant financial strain. Crucially, it will put holidaying and hosting further out of reach for many Australians, with a range of unintended consequences, as outlined below.

### **Fewer, less affordable accommodation options**

Airbnb notes that the short-stay accommodation market is not static. The properties available change and churn depending on the wishes of the Host, changes in ownership, the time of year and tourism peaks, such as festivals and major events. The fact that a property has a short-stay accommodation permit, does not necessarily mean that the property is, in fact, currently available as accommodation. Given the flexibility of the market, a ban on permits will not lead to a ceiling on a short-stay but potentially a reduction in the number of properties available over time.

Imposing controls on where short-stay accommodation can and cannot operate within the community creates an uneven playing field and reduces the range of accommodation options in Hobart. In order to flourish, the city needs a vibrant mix of accommodation types that offer visitors more choice, particularly for families on a budget. The [Report to Council](#) suggests that the proposed amendment would result in more visitors using hotel or serviced accommodation and greater local economic benefit. However, regulation should not be about one type of accommodation against another, but rather growing the tourism pie for the benefit of the entire community. Fewer short-stay properties does not mean that guests will simply move to traditional accommodation providers. Instead, the proposed ban risks diverting tourists and spending to neighbouring council areas with less restrictive rules and requirements, placing the Hobart visitor economy at a serious competitive disadvantage.

Our platform provides everyday people with a range of suitable options within their budget and allows many to travel who might not otherwise be able to. For many families, staying in short-stay accommodation is better suited to their needs as they can access kitchen facilities, outdoor

spaces and multiple bedrooms when travelling with children and extended family members. These opportunities are not typically available in traditional accommodation or are prohibitively expensive for the average family. We know of many Hobart Hosts and guests who utilise short-stay accommodation for intergenerational family holidays or to stay close to family and friends when visiting from regional areas. A ban on the issuance of new permits in residential areas, where larger family homes are generally available, will significantly reduce accommodation options and restrict opportunities for family and group travel.

The proposed amendment will also limit the City of Hobart's ability to accommodate interstate and international visitors when major events, conferences and festivals come to town. The surge capacity, or elastic supply, that the Airbnb community can provide creates opportunities for attracting and hosting major events in cities and regional towns. With a ban on short-stay accommodation in residential areas in place, Hosts in Hobart will lose the ability to quickly and easily share their homes when demand for accommodation surges. This will have significant negative impacts on popular, major events that take place annually in Hobart, such as Dark Mofo and Taste of Summer. Hosts and local businesses will ultimately lose out, with guests deciding to stay in other areas with more affordable options available.

Reducing supply will inevitably lead to less affordable accommodation options in Hobart, particularly in residential areas that are not well serviced by traditional accommodation. Families will bear the brunt of this, as they face difficulties finding accommodation to suit their needs and within their budget. Our platform plays an important role in democratising travel, allowing Australians to explore parts of the country that might not otherwise be financially feasible. Higher accommodation costs will force many to travel to other more affordable destinations or simply decide not to travel at all.

The Council's proposal should not be seen as a mere cap on the existing number of available permits for unhosted short-stay accommodation. Rather, it is a handbrake on the visitor economy in Hobart and its ability to evolve and respond to future consumer demand and preferences. This will place Hobart at a disadvantage to other jurisdictions, where there is appropriate recognition of changing consumer habits and desire to embrace innovative, technological solutions.

### **Myriad use-cases for short-stay accommodation**

Disappointingly, the proposed ban on short-stay accommodation neglects the myriad reasons that Hosts and guests utilise this vital form of accommodation and the impacts on everyday Tasmanians. This includes, but is not limited to, accessing essential health care, education or work opportunities, to attend major events or conferences, during emergencies, and visiting friends and family from regional and remote areas of the state. The use of short-stay for non-tourism reasons is not a new phenomena: short-stay properties have existed for decades and technology has enabled Hosts to utilise the sharing economy to monetise their spaces and

help make ends meet. We know that a ban on new permits will have adverse impacts on everyday citizens who rely heavily on short-stay to live, work and travel on a budget.

For example, we know of essential workers (such as nurses and medical professionals) who live outside of Hobart and use short-stay accommodation to stay in close proximity to their workplaces when on night shift, and others who use short-stay accommodation to be closer to medical facilities when seeking regular treatment or care, whether or themselves or vulnerable family members. We also know of tradespeople in the construction industry that utilise short-stay accommodation to live whilst working on a project away from their primary home. The cost of staying in, and availability of, traditional accommodation during these short, but regular stays is prohibitive for many and platforms like Airbnb provide cost effective options that suit their particular needs.

Data indicates that the accommodation needs of people are changing and a ban on the issuance of new permits in residential areas would not support the growing demand for short-stay accommodation in Tasmania. According to Tourism Tasmania's [Tourism Snapshot 2021](#), the pandemic has influenced a shift in preferred accommodation styles and trip lengths across the state. Nights spent in 'self-contained accommodation' has tripled since 2019 and the number of nights stayed has increased from approximately three nights to a week or more in 2021.<sup>12</sup>

This data mirrors trends we are seeing on our own platform. Over the last two years, Airbnb has seen average trip length increase by approximately 15%, with stays of more than 7 days now representing nearly half of all gross nights booked.<sup>13</sup> It indicates a shift in the way people are living, working and travelling and the need for regulatory frameworks to be flexible and agile in adequately reflecting this. The reason our platform has been able to respond to this changing world of travel is because our model is inherently adaptable. We have Airbnb Hosts all over the world who offer nearly every type of home in nearly every community around the world. These homes accommodate all types of travel and the diverse needs of guests, highlighting the importance of having regulatory settings that are future-proof and adaptive.

Overall, the proposed ban on short-stay accommodation fails to appreciate the many reasons that Hosts and guests utilise short-stay accommodation and turns the tap off on vital forms of accommodation that supports the local community. As noted previously, for many Hosts, their short-stay properties are holiday homes or city homes that would otherwise remain empty if not used for accommodation and will not become available on the long-term property market. The ban does not meaningfully address the issues that Council is attempting to solve, but instead disadvantages the entire community by limiting opportunities to grow the local visitor economy.

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<sup>12</sup> Tourism Tasmania, '[Tasmanian Tourism Snapshot: Year ending December 2021](#)', pp. 6.

<sup>13</sup> Airbnb data, [Shareholder letter Q1 2022](#).

## **Reverse impact on property values and permit approvals**

Airbnb appreciates that existing short-stay permit holders will not be affected by the proposed amendment to the local planning scheme. However, we are concerned that the ban on new permits is likely to have a number of unintended consequences, including on property prices and permit applications. Our platform provides unique accommodation options at a variety of price points and reduced supply does not mean that demand will simply dissipate with a ban on the issuance of new permits.

In fact, the ban risks undermining the Council's policy objectives by potentially increasing the value of properties that already have a short-stay permit. Limits on the number of properties that can operate short-stay accommodation places a premium on those that already have permitted use rights and may increase demand due to the potential economic opportunities that the permit provides. While Airbnb recognises the difficulty in predicting the precise impact of this ban in this regard, any increases in individual property prices can set broader pricing trends and expectations, including on rental affordability. Airbnb and other commentators have previously warned Hobart City Council of this potentially paradoxical outcome should a ban on permits be pursued and again urge the Council to carefully consider this issue to avoid worsening the impacts on the local community.

Further, we are also conscious that the proposed amendment will create a rush on new permit applications in the intervening period between public consultation and the ultimate decision. We note that the Report to Council estimates that, if pursued, amendments to the Hobart Local Planning Scheme will be finalised towards the end of 2022, signalling a considerable window within which local Hobartians can obtain a permit. We note that additional permit applications may also have the effect of delaying the myriad of other planning applications the Council must consider. This is highly likely to have significant resourcing implications and, in turn, create delay for any property owners in the Hobart local council that are seeking approvals for any other purpose. Airbnb reasonably expects that for the foreseeable future, the Council will continue issuing approvals for short-term rental accommodation in line with the existing processes and make decisions based on the policy as it currently stands.

## **Conclusion**

Airbnb welcomes any opportunity to work constructively with the City of Hobart and other stakeholders to support the development of evidence-based policy settings that build housing supply, help address the unique stressors that come with population change, and ensure that the visitor economy continues to contribute to the economic well-being of Hobart.

At the same time, we stress that the influence of Airbnb's community of Hosts and guests, are infinitesimal when compared to the other many factors that impact the broader housing market in Australia. The nature of our role in the Hobart landscape is such that we assist in growing the

potential of existing dwellings and economically empower ordinary Tasmanians to share their home and offset the cost of their housing through hosting.

Crucially, Airbnb notes that the Council's proposal is extremely unlikely to have a substantive impact on the availability of affordable rental housing in the City of Hobart.

Thank you again for the opportunity to make a submission to this process.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Mcrosby', with a stylized, cursive script.

Michael Crosby  
Public Policy Manager, ANZ  
Airbnb  
[michael.crosby@airbnb.com](mailto:michael.crosby@airbnb.com)

**From:** Cynthia Townley <policy@sheltertass.org.au>  
**Sent:** Friday, 6 May 2022 2:06 PM  
**To:** Representation  
**Cc:** Pattie Chugg; Shelter Tas Communications  
**Subject:** FW: representation attached  
**Attachments:** PSA-22-1 Amendment – Short Stay Accommodation\_Shelter Tas RepMay 2022

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon,  
please find attached the Shelter Tas representation on PSA-22-1 Short Stay Accommodation,  
regards,  
Cynthia



**Dr Cynthia Townley (she/her)**  
**Policy Officer | Shelter Tasmania**  
**Peak Body for Housing and Homelessness**  
GPO Box 848 HOBART Tas 7001  
0418 291 870

My regular work days are Monday, Tuesday, Thursday and Friday.

**If you require emergency accommodation, please ring Housing Connect on 1800 800 588.**

**[Get the latest on Tasmania's housing and homelessness sector – subscribe to the Shelter Tas eNews.](#)**



Shelter Tasmania acknowledges the Traditional Owners of country throughout Tasmania and their continuing connection to the land, sea and community. We pay our respects to them and their cultures, and to elders past and present.



Shelter Tas welcomes and supports people of diverse genders and sexual orientations.

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**From:** Cynthia Townley <>  
**Sent:** Friday, 6 May 2022 1:56 PM  
**To:** Pattie Chugg  
**Subject:** representation attached

Hi Pattie  
please find attached

cheers  
cyn





**Dr Cynthia Townley (she/her)**  
**Policy Officer I Shelter Tasmania**  
**Peak Body for Housing and Homelessness**  
GPO Box 848 HOBART Tas 7001  
0418 291 870

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**PSA-22-1 AMENDMENT – SHORT STAY ACCOMMODATION  
SHELTER TAS REPRESENTATION, MAY 2022**



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**6 May 2022**

## **Representation in relation to PSA-22-1 Amendment - Short Stay Accommodation**

### **About Shelter Tas**

Shelter Tas is Tasmania's peak body for housing and homelessness services. We are a not-for-profit peak organisation representing the interests of low to moderate income housing consumers, community housing providers and Specialist Homelessness Services across Tasmania. We provide an independent expert voice on housing rights and a link between the Tasmanian government and the community through consultation, research and policy advice. We work towards a fairer and more just housing system. Our vision is affordable, appropriate, safe and secure housing for all Tasmanians and an end to homelessness. Shelter Tas is a member of National Shelter, and also represents the Community Industry Housing Association (CHIA) in Tasmania.

### **Our representation**

Shelter Tas appreciates the opportunity to make a representation concerning PSA 22-1 – Short Stay Accommodation. Shelter Tas supports this amendment. We understand that this amendment will enable a Planning Authority (the City of Hobart) to mitigate the negative impacts of short stay accommodation by restricting new permits for entire homes.

Our representation focusses on the need for a planning mechanism to enable local planners to better manage short stay visitor accommodation.

Tasmania is no longer a cheap place to rent or buy a home. There is substantial evidence that the rapid change in Tasmania's housing market has squeezed many people into housing stress, and in some cases into homelessness. CoreLogic's Rental Report for April 2022 shows that over the last year, Hobart's median rent has risen by 8.7%. The median price for renting in Hobart is now \$532 per week, compared with a national cost of \$509. Melbourne's median weekly rent is \$468, \$64 per week lower than Hobart.<sup>1</sup>

One reason for the increasing cost and pressure in Hobart is the expansion of short stay accommodation in properties that were previously homes for long-term residents.

There is clear evidence in Hobart that long-term rental properties have been converted to short stay accommodation. New research shows that 47% of short-term rental properties in selected suburbs in the Hobart LGA had a history of being long-term residential rental properties.<sup>2</sup>

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<sup>1</sup> [https://images.insight.corelogic.com.au/Web/RpDataPtyLtd/%7bdeba730d-cc80-475c-891c-3e2572539969%7d\\_Quarterly\\_Rental\\_Review\\_Report.pdf?elqTrackId=5e4b0e8ec7044b73bb784ab50f08699f&elq=1e3c684317464a69809e5cafee00b0c9&elqaid=3675&elqat=1&elqCampaignId=2506&elqcst=272&elqcsid=327](https://images.insight.corelogic.com.au/Web/RpDataPtyLtd/%7bdeba730d-cc80-475c-891c-3e2572539969%7d_Quarterly_Rental_Review_Report.pdf?elqTrackId=5e4b0e8ec7044b73bb784ab50f08699f&elq=1e3c684317464a69809e5cafee00b0c9&elqaid=3675&elqat=1&elqCampaignId=2506&elqcst=272&elqcsid=327)

<sup>2</sup> Phibbs and Ely, forthcoming 2022 "Monitoring the Impacts of Short Term Rentals on Tasmania's Housing Market"

Key evidence showing the need to manage short stay accommodation includes:

- The density of short stay accommodation in Hobart, which is 9.33% of the private rental market, compared with Sydney's 2.08% and Melbourne's 3.82%<sup>3</sup>
- The shrinking private rental market for long-term residents – for example, Hobart's private rental market fell by 2.9% between 2018-2019, compared to Sydney which increased by 5.3%.<sup>4</sup>
- The identification of a high proportion of properties currently used for short stay visitor accommodation that had previously been used for long-term rentals.

The proposed PSA 22-1 – Short Stay Accommodation will help to manage the increasing conversion of long-term rentals into short stay accommodation through planning mechanisms that enable local planners to limit short stay permits.

Across Tasmania, short stay listings grew from 2 303 in July 2016 to 5 218 in February 2019. If current trends continue unchecked Hobart's rental crisis will become even worse. We can learn from other jurisdictions: in parts of the Gold Coast and NSW, short stay accommodation density is approaching 50%.

An unaffordable private rental market has the greatest impacts on the people least able to withstand them. For example, older people living on fixed incomes, pensions and benefits; long-term residents with attachment to community and place; people living with a disability; and single person households are some of the most vulnerable to the pressures of an unaffordable rental market.

Turn away rates from emergency accommodation services have nearly doubled in five years, and more people are living in housing stress and hardship due to the critical shortage of affordable rental housing in Tasmania. With over 8 000 Tasmanians living in housing stress, and over 1 600 experiencing homelessness, every home counts. Better management of the numbers of short stay accommodation properties is part of ensuring that all Tasmanians have a safe, affordable, appropriate and secure place to call home.

### **Housing pressures have increased dramatically in Tasmania in recent years**

Since 2018, the cost of housing in Tasmania has seen unprecedented growth in both purchase prices and rental prices. Higher rental costs have the greatest impact on households earning lower incomes. Housing stress and hardship have increased for many Tasmanians, and Tasmania is in a state of perpetual housing crisis.

In particular, there is a chronic shortage across Tasmania (and especially in Hobart) of affordable rental options for people on low and moderate incomes. Since 2018, on the standard measure that compares income to rental cost, Hobart has been Australia's least affordable capital city for renters.<sup>5</sup> Factors including the loss of properties to short stay accommodation have led to increasing numbers of people experiencing housing stress and homelessness across the state.

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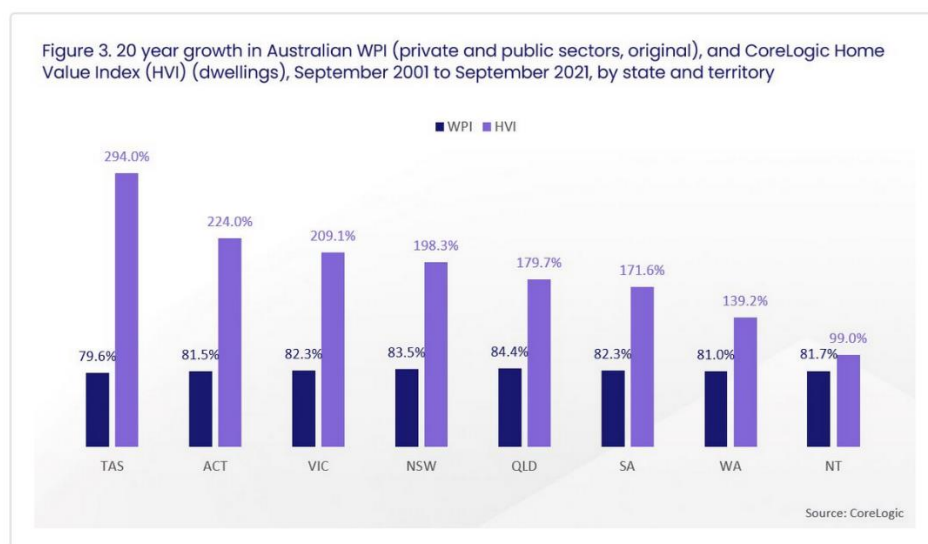
<sup>3</sup> Phibbs and Ely forthcoming

<sup>4</sup> Phibbs and Ely forthcoming

<sup>5</sup> <https://www.sgsep.com.au/projects/rental-affordability-index>

Increasing numbers of Tasmanians are renting, and for longer periods. The number of households renting in Tasmania increased by 18% from 2008 to 2016, (from 45 600 in 2008 to 54 000 in 2016), with 2021 Census data likely to show a further increase.

According to CoreLogic's November 2021 report, wages in Tasmania have seen the lowest increase in the country over the last 20 years, and Tasmania's house purchase prices have seen the highest increase over that period compared with other states.<sup>6</sup>



Tasmania has a high proportion of people receiving social security payments and Tasmanian workers earn lower wages than the Australian average. The average weekly ordinary time earnings for an adult working full time are \$206.70 lower in Tasmania than the national average (Tasmania: \$1541.70, Australia: \$1748.40, ABS stats for Nov 2021).<sup>7</sup> Throughout Tasmania there is a widening gap between people's incomes and housing costs. With an ageing population, and 1 in 4 Tasmanians living with a disability, on this trend the gap between incomes and housing costs will continue to widen. Over 120 000 Tasmanians now live in poverty.<sup>8</sup>

Tasmania's population is ageing, and is the oldest of all States and Territories. More than one-third (34.7%) of Tasmania's population is aged over 60, compared with the national level of 28.5%.<sup>9</sup> This means Tasmania has growing numbers of smaller households living on low and fixed incomes, who are increasingly exposed to housing hardship due to increased rental costs.

On Census night 2016, 1 622 Tasmanians were experiencing homelessness and we expect to see a higher number reported in the 2021 Census figures. The latest report (December 2021) from the Australian Institute for Health and Welfare (AIHW) shows that every day in Tasmania 46 requests to

<sup>6</sup> [https://www.corelogic.com.au/news/how-much-has-house-price-growth-outstripped-growth-wages?utm\\_medium=email&utm\\_source=newsletter&utm\\_campaign=20211122\\_propertypulse](https://www.corelogic.com.au/news/how-much-has-house-price-growth-outstripped-growth-wages?utm_medium=email&utm_source=newsletter&utm_campaign=20211122_propertypulse)

<sup>7</sup> <https://www.abs.gov.au/statistics/labour/earnings-and-work-hours/average-weekly-earnings-australia/latest-release#state-and-territory>

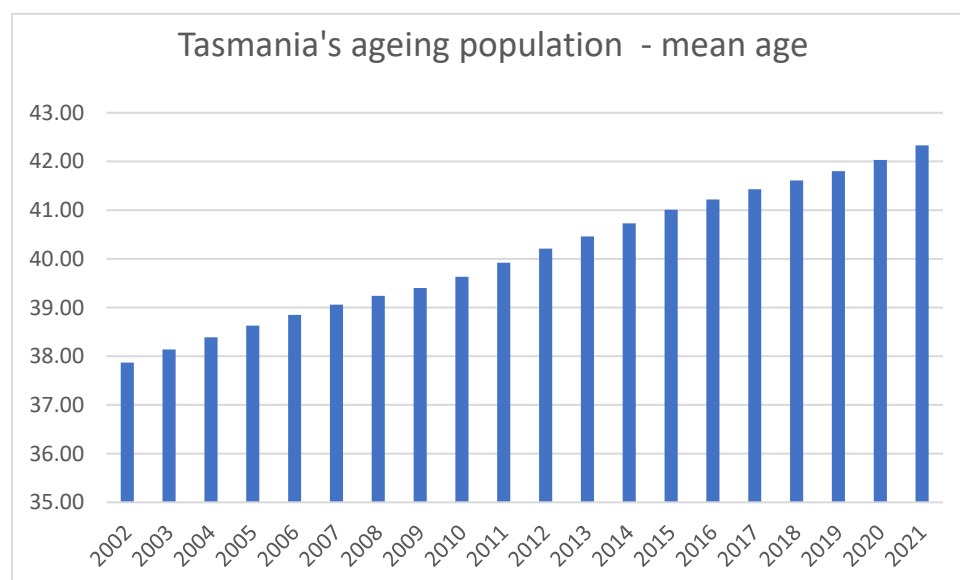
<sup>8</sup> <https://www.tascoss.org.au/120000-tasmanians-live-in-poverty/>

<sup>9</sup> <https://www.abs.gov.au/statistics/people/population/national-state-and-territory-population/jun-2021#states-and-territories> Table 4 and Table 6.

Specialist Homelessness Services go unassisted – this number has almost doubled since the 2016-17 financial year when 25 requests for assistance were unmet each day.<sup>10</sup>

As the cost of housing outstrips people's incomes, more and more households are left in rental stress and facing the risk of homelessness. This problem is amplified in Tasmania because the private rental market is shrinking. In 2021 the Anglicare Rental Affordability Snapshot reported only 729 properties advertised for rent across Tasmania. Eight years earlier, in 2013, the Snapshot reported 2 677 properties advertised. In 2021 in Tasmania's Southern Region (which includes Hobart) there were only 433 properties advertised as available to rent, compared with 1304 in 2013.<sup>11</sup> This shrinking private rental market leads to greater scarcity, more intense competition and higher prices. The use of former long-term rentals for short stay visitor accommodation contributes to the shrinkage of the private rental market.

In summary, the shortage of affordable rentals in Tasmania is driven by many factors, including the conversion of residential properties to short stay accommodation in all regions of Tasmania.<sup>12</sup> At the same time, Tasmania's population is increasing and house prices are surging, yet home ownership rates are declining.<sup>13</sup> This means people are renting for longer before being able to purchase a home, and as a result there is even more pressure on the private rental market. If these trends continue, higher proportions and greater numbers of people will be life-long renters in Tasmania, and the need for stable, secure affordable social housing will continue to grow.



<sup>10</sup><https://www.aihw.gov.au/getmedia/0351fdb4-07f1-4ed8-9685-3ff0c668ff6f/aihw-hou-322-tas-factsheet.pdf.aspx> <https://www.aihw.gov.au/getmedia/c58999e7-db14-42ad-937e-d7880359e9ea/shs-2016-17-tas-factsheet.pdf.aspx>

<sup>11</sup> <https://www.anglicare-tas.org.au/research/anglicare-tasmania-rental-affordability-snapshot-2021/>

<sup>12</sup> <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

<sup>13</sup> <https://www.corelogic.com.au/reports>



Older people on lower and fixed incomes have limited capacity to increase earnings. They are at risk of homelessness at a stage in life when the importance of stable housing for ageing in place is essential.

Since 2017 the growing waiting list for social housing in Tasmania has reflected increased need across the community, driven by the tight and expensive private rental market with reduced vacancy rates and rising rents. Demand for social housing has increased, with over 4 000 households on the Housing Register since March 2021 (with 4 407 households registered as at February 2022).<sup>14</sup> Shelter Tas supports state initiatives, such as the development of the *Tasmanian Housing Strategy* and increased investment in social housing.

The State Government's light touch regulation of short stay accommodation with very few barriers or restrictions was introduced in 2017 as a way to encourage the visitor economy. Now, given the escalating pressures on Tasmania's housing market and especially the rental market, it is time to update this permissive approach. Limiting the numbers of short stay accommodation properties will not resolve Tasmania's housing crisis, but it can make a positive contribution - and every home counts.

Increasing the supply of new homes will not resolve the rental crisis in Tasmania if these properties continue to be converted to short stay accommodation. Planning authorities need the power to pause the drift of properties to short stay uses when their local communities are facing a critical shortage of longer term rental homes. Regulation of short stay accommodation is essential to secure an equitable and sustainable private rental market.

Shelter Tas supports the Amendment PSA-22-1 as it will help to mitigate the negative impacts of short stay visitor accommodation by limiting new permits for entire homes to be used for visitors. This Amendment will apply in the City of Hobart, and will provide a pathway for other Planning Authorities to follow in cases where they see the same pressures in their local areas. The Amendment will enable Planning Authorities to respond to community level housing needs in a timely manner, and will contribute to maintaining the availability of dwellings for occupation by permanent residents rather than occasional visitors. Importantly the Amendment will constrain new uses of properties for short stay accommodation rather than long-term homes, but it will not change existing permitted uses.

For further information on this submission, please contact:

Pattie Chugg  
Chief Executive Officer, Shelter Tas  
[ceo@sheltertass.org.au](mailto:ceo@sheltertass.org.au)

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<sup>14</sup> [https://www.communities.tas.gov.au/\\_data/assets/pdf\\_file/0032/209966/Housing-Dashboard-February-2022.pdf](https://www.communities.tas.gov.au/_data/assets/pdf_file/0032/209966/Housing-Dashboard-February-2022.pdf)



**From:** Sholeh Alishah <alishah.sholeh@gmail.com>  
**Sent:** Friday, 6 May 2022 2:28 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

On Airbnb and <http://booking.com>. income generating

Got to know very interesting people from around the globe . A great boost in Tasmanian economy

Tourism industry will suffer and no income for hosts in particular for the retirees who have been hosts and enjoying their extra income

Regards,  
Sholeh Alishah

**From:** Karyl Michaels <karylmichaels@gmail.com>  
**Sent:** Friday, 6 May 2022 2:29 PM  
**To:** Representation  
**Subject:** My submission on the proposed amendment - Short Stay Accommodation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Hobart Council,

Have hosted a bnb at our home for 7 years. Great way to meet people and supplement income.

Home sharing brings in visitors who spend money in the local economy.

Ban will mean less visitors and less money and jobs in the local economy. .

Regards,  
Karyl Michaels

**From:** Rob O'Connor <channelskimmer@outlook.com>  
**Sent:** Friday, 6 May 2022 2:38 PM  
**To:** Representation  
**Subject:** Hobart Interim Planning Scheme 2015 PSA-21-4 Amendment – Rezone 21, 21B and part of 21A Enterprise Road, Sandy Bay

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I am writing in support of the short stay rule amendments proposed by Hobart City Council.

We are in the midst of an unprecedented housing crisis which is impacting on most people in the community. The rental market has been severely under resourced for a long time with a shortage of social and affordable housing. This shortage has been exacerbated by the growing popularity of Tasmania and Hobart and short time stay visitors taking a lot of properties out of the traditional rental market.

I am 79 and was a home owner for over 40 years. In my early '70's after selling my home, I made a decision not to buy again instead, selecting to rent. It turned out to be at the beginning of housing crisis. The peace of mind I had anticipated was not to be as I found myself a gypsy, moving 4 times in three years as my then landlords ended leases to avail themselves of the holiday markets. When looking for a new place to live I was confronted by 50 or so other people including students, looking at the same property. Many properties were very basic, but in spite of this they were out of my financial reach.

I am for now settled in a nice unit at a rent I can afford, with good and supportive landlords. My journey has not been unique and has been far better than the fate many people face when looking for a roof over their heads in the current market. It was a stressful and costly time for me but I am one of the lucky ones. I have been technically homeless twice, including after the 2018 Hobart flood, but was saved from that fate by the generosity of friends. I have a little money of my own over and above the age pension, I have been given a good education and I am reasonably articulate and usually able to source solutions, but even so it has been very difficult.

Everybody should have the right to an adequate home, it is a basic human right, but at the moment in Hobart that is not a given and many people are living in sub standard properties paying high rents, with only basic facilities, or worse living in their cars or on the streets.

To further deplete the very small stock of available properties by enabling more short term rentals is a recipe for disaster and can only result in more people sleeping on the streets, in their cars, or relying on the generosity of friends. In a rich country like Australia this is not acceptable.

I therefore applaud the amendment proposed by Hobart City Council as a small step towards rectifying this issue of supply.

Thank you for allowing me the opportunity to comment on this proposal.

ROBYN O'CONNOR

**From:** Rob O'Connor <channelskimmer@outlook.com>  
**Sent:** Friday, 6 May 2022 3:10 PM  
**To:** Representation  
**Subject:** Fwd: Hobart Interim Planning Scheme 2015 PSA-21-4 Amendment – Rezone 21, 21B and part of 21A Enterprise Road, Sandy Bay

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

P.S... I just wanted to clarify that although I am currently a resident in Kingborough, I was made homeless during the 2018 floods while a resident at Sandy Bay within the Hobart City Council area. At that time I was unable to find accommodation within the area of Hobart Council and moved to a unit in Kingborough.

Begin forwarded message:

**From:** Rob O'Connor  
**Date:** 6 May 2022 at 2:38:28 pm AEST  
**To:** representation@hobartcity.com.au  
**Subject:** Hobart Interim Planning Scheme 2015 PSA-21-4 Amendment – Rezone 21, 21B and part of 21A Enterprise Road, Sandy Bay

I am writing in support of the short stay rule amendments proposed by Hobart City Council.

We are in the midst of an unprecedented housing crisis which is impacting on most people in the community. The rental market has been severely under resourced for a long time with a shortage of social and affordable housing. This shortage has been exacerbated by the growing popularity of Tasmania and Hobart and short time stay visitors taking a lot of properties out of the traditional rental market.

I am 79 and was a home owner for over 40 years. In my early '70's after selling my home, I made a decision not to buy again instead, selecting to rent. It turned out to be at the beginning of housing crisis. The peace of mind I had anticipated was not to be as I found myself a gypsy, moving 4 times in three years as my then landlords ended leases to avail themselves of the holiday markets. When looking for a new place to live I was confronted by 50 or so other people including students, looking at the same property. Many properties were very basic, but in spite of this they were out of my financial reach.

I am for now settled in a nice unit at a rent I can afford, with good and supportive landlords. My journey has not been unique and has been far better than the fate many people face when looking for a roof over their heads in the current market. It was a stressful and costly time for me but I am one of the lucky ones. I have been technically homeless twice, including after the 2018 Hobart flood, but was saved from that fate by the generosity of friends. I have a little money of my own over and above the age pension, I have been given a good education and I am reasonably articulate and usually able to source solutions, but even so it has been very difficult.

Everybody should have the right to an adequate home, it is a basic human right, but at the moment in Hobart that is not a given and many people are living in sub standard properties paying high rents, with only basic facilities, or worse living in their cars or on the streets.

To further deplete the very small stock of available properties by enabling more short term rentals is a recipe for disaster and can only result in more people sleeping on the streets, in their cars, or relying on the generosity of friends. In a rich country like Australia this is not acceptable.

I therefore applaud the amendment proposed by Hobart City Council as a small step towards

rectifying this issue of supply.

Thank you for allowing me the opportunity to comment on this proposal.

ROBYN O'CONNOR

**From:** Simon Wright <simonw.tas@gmail.com>  
**Sent:** Friday, 6 May 2022 3:31 PM  
**To:** Representation  
**Subject:** Fwd: Regulation of short-term accomodation  
**Attachments:** Regulation of Short-term Accommodation SWright 6May2022.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Please find attached my representation to Council regarding the regulation of short-term accommodation.

Cheers

Simon Wright

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*Dr Simon Wright  
24 Reynolds Court  
Dynnyrne, TAS  
0417 233 326*

# **Regulation of Short-term Accommodation**

**Representation to Hobart City Council 6 May 2022**

**Dr Simon Wright**

This representation is to express my strong support for the HCC to regulate the use of whole houses for short-stay accommodation. My main areas of concern are the displacement of renters in a time of severe housing undersupply, the effect on house prices and rentals, and the disruption to neighbours of short-stay premises. I believe that the regulations should apply to all properties, not just new builds, and that the rates should be adjusted appropriate to the income from such properties.

## **Displacement of renters**

It is a sad indictment on our society that more than 460 premises are tied up in tourist accommodation while citizens, even those in active employment, are sleeping rough due to lack of housing. It seems that the profits of investors are prioritised over the needs of the community.

The figure of 460 is likely to be an underestimate. As described below, a property in our street was dishonestly sub-let as short stay on We-Chat by a Chinese “businessman” who was able to whisk several carloads of guests off to another location when his scam was discovered. He must have had several properties. If one is doing it, there are probably many, as there is a strong financial incentive to do so. This man would have been counted as a “renter” if not discovered.

## **Effect on house prices and rentals**

The short-stay sector puts residents in direct competition with tourists for access to accommodation. According to AirBnB Host Louise Elliot, tourists will pay \$800 per night for her investment property. How are renters supposed to compete with this? How are residential buyers to compete with those expecting (and negative gearing) such returns? With a gross under-supply of housing, house prices have surged and rental prices for the few available houses have risen dramatically.

## **Disruption to neighbours**

As mentioned above, our quiet cul-de-sac was briefly subjected to a short stay listing of a property in contravention of the lease. On each of the two nights, more than 20 Chinese guests were present, filling the street with cars, and partying all night. The parties spilled out into the street to have loud shenanigans below our bedroom window at 3am as we tried to sleep. Fortunately we knew the owner, who was able to terminate the lease and get the businessman evicted.

## **Regulation**

1. If there is to be short-term accommodation, it is imperative that the owners are present and accountable for the actions of their guests. A phone number must be publicly displayed so that nearby residents can contact the owner in case of bad behaviour or emergency.
2. Regulation **MUST** apply to all new whole properties, lest new properties are diverted to the short-stay market rather than rents.
3. Regulation **SHOULD** apply to existing whole properties to reduce the housing crisis and to prevent inequities where one group of landlords is favoured over another. If not, the rates should be adjusted appropriate to the income from such properties.

## **Contact Details**

Dr Simon Wright  
24 Reynolds Court  
Dynnyrne  
[simonw@gmail.com](mailto:simonw@gmail.com)





**From:** Ben Bartl <ben@tenantstas.org.au>  
**Sent:** Friday, 6 May 2022 4:41 PM  
**To:** Representation  
**Subject:** PSA-22-1 Amendment - TUT Representation  
**Attachments:** HCCRepresentation060522.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Chief Executive Officer  
Hobart City Council  
Re: PSA-22-1 Amendment - Visitor Accommodation

To Kelly Grigsby,

Please find attached a representation from the Tenants' Union of Tasmania in relation to the proposed amendment to the *Hobart Interim Planning Scheme 2015* (PSA-22-1-Amendment).

If you have any queries, please do not hesitate to contact us.

Kind regards,

Ben



6 May 2022

Hobart City Council  
GPO Box 503  
Hobart TAS 7001  
attn: Chief Executive Officer

**via email:** [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

To Kelly Grigsby,  
**Re: PSA-22-1-Amendment – Visitor Accommodation**

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The Tenants' Union of Tasmania welcomes the opportunity to provide a representation to the proposed amendments to the *Hobart Interim Planning Scheme 2015* (Tas). We strongly believe that visitor accommodation has had a negative impact on both the supply and affordability of long-term rentals in the Hobart City Council municipality. We support the amendments proposed but recommend further restrictions of visitor accommodation within the Hobart City Council municipality.

The Tenants' Union of Tasmania is a not-for-profit community organisation providing information, advice and representation to all residential tenants living throughout Tasmania. We also offer community legal education and training and advocate for the improvement of residential tenants' rights.

### **An overview of the rental market in Hobart**

Over the last five years median rents in the Hobart City Council municipality have increased by 27 per cent from \$470.00 per week to \$600.00 per week.<sup>1</sup>

CoreLogic reports that median rents in Hobart are more expensive than Adelaide, Brisbane, Perth and Melbourne.<sup>2</sup> At the same time, Tasmanians have the lowest median income of any State or Territory in Australia.<sup>3</sup>

Greater Hobart is Australia's least affordable capital city relative to income according to the *Rental Affordability Index* (RAI). The RAI found that tenants in Greater Hobart spend around 34 per cent of their income on rent – placing the median tenant in rental stress.<sup>4</sup>

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<sup>1</sup> Rental Deposit Authority and Tenants' Union of Tasmania, *Tasmanian Rents* (December Quarter 2017-2021).

<sup>2</sup> CoreLogic, *Quarterly Rental Review* (April 2022) at 9.

<sup>3</sup> According to the Australian Bureau of Statistics, the median total income in 2018-19 in Tasmania was \$47,352 compared with South Australia (\$49,888), Queensland (\$50,298), Victoria (\$51,027) and Western Australia (\$54,220). The Australian Capital Territory has the highest median income at \$66,594: Australian Bureau of Statistics, 'Personal Income in Australia'.



According to the *Department of Communities Tasmania* the vacancy rate in Hobart in February 2021 was 0.6 per cent and is currently 0.3 per cent.<sup>5</sup>

Skyrocketing rents and the lack of affordable rental properties is likely to have played a role in Hobartians being forced to move further away from their workplaces, extended families and friends and essential services located in the Hobart City Council municipality. The Australian Bureau of Statistics recently reported that the Hobart City Council municipality lost 971 residents in 2020-21 whilst Clarence gained 553 residents, Brighton gained 486 residents and the Huon Valley gained 281 residents.<sup>6</sup>

### **An overview of short-term accommodation in Hobart**

There are currently 481 investment properties being used as visitor accommodation within the Hobart City Council municipality, including a nine per cent increase between 1 July 2021 – 31 December 2021.<sup>7</sup> All 481 properties are investment properties because properties that are “used by the owner or occupier as their main place of residence, and only let while the owner or occupier is on vacation or temporarily absent” are not included in the data.<sup>8</sup>

In December 2020 the Australian Housing and Urban Research Institute released a report entitled ‘Marginal housing during COVID-19’ which analysed the impact of COVID-19 on the private rental market. The report found that the return of an estimated 113 Airbnb properties to the private rental market in the Hobart City Council municipality during COVID-19 had resulted in a nine per cent reduction in rents and concluded “it is clear that relatively small changes in the availability of dwellings can have very significant impacts on rents”.<sup>9</sup>

In 2018, the Tasmanian Planning Commission acknowledged that “the conversion of housing stock to short term visitor accommodation is impacting the availability and affordability” of long-term rentals.<sup>10</sup>

The findings from Hobart are not an outlier with the short stay accommodation market around the world increasing rents and reducing rental supply. In the words of Emeritus Professor Peter Phibbs: <sup>11</sup>

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<sup>5</sup> Department of Communities Tasmania, ‘Housing Dashboard – March 2022’ at 25.

<sup>6</sup> Australian Bureau of Statistics, ‘Regional Population, 2020-21’ Table 6, Estimated resident population and components, Local Government Area.

<sup>7</sup> The number of investment properties being used as visitor accommodation increased in the Hobart City Council municipality increased from 440 to 481 between 1 July 2021 – 31 December 2022. As found in Hobart City Council, City Planning Committee Meeting Agenda, 7 February 2022 at 294.

<sup>8</sup> Clause 3.1(b) of *Planning Directive No. 6 - Exemption and Standards for Visitor Accommodation in Planning Schemes*.

<sup>9</sup> Australian Housing and Urban Research Institute, *Marginal housing during COVID-19* (Final Report No. 348: December 2020) at 40.

<sup>10</sup> Tasmanian Planning Commission, *Exemptions and Standards for Visitor Accommodation in Planning Schemes*, Draft Planning Directive No 6 (2018) at 18.

<sup>11</sup> Judy Augustine, “Unfair’: Airbnb boss says council is singling out Hobart hosts’, *The Mercury* 28 March 2022.

*There's been a lot of academic research on short term rentals, literally hundreds of studies and those studies have concluded there's a relationship between increases in short term activity and increases in housing rents.*

In summary, visitor accommodation has had a negative impact on the Hobart rental market by reducing supply and increasing prices.

**Amendments to Hobart Interim Planning Scheme 2015**

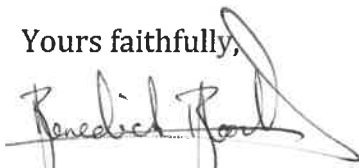
We strongly support the draft amendment PSA-22-1 to the *Hobart Interim Planning Scheme 2015*. We strongly believe that there should be a restriction on short-stay/visitor accommodation within the Hobart City Council municipality through its exclusion from the General Residential Zone, the Inner Residential Zone and the Low Density Residential Zone of the *Hobart Interim Planning Scheme 2015*.

However, in our opinion the amendments should go further. Given that the policy rationale for restricting future visitor accommodation is in part to "increase availability of dwellings for occupation by permanent residents" it is unclear why the draft amendments would exclude ancillary dwellings. Ancillary dwellings have a floor area not greater than 60m<sup>2</sup> making them a desirable accommodation option, particularly for single persons and older people. By also excluding ancillary dwellings, the Hobart City Council would be increasing accommodation options for permanent residents.

We recommend that the draft amendment is supported with ancillary dwellings also excluded.

If you have any queries, please do not hesitate to contact us.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Benedict Bart', written over a horizontal line.

Benedict Bart  
Principal Solicitor  
**Tenants' Union of Tasmania**

---

**From:** Katie Fredheim <katiefredheim@live.com>  
**Sent:** Friday, 6 May 2022 7:30 PM  
**To:** Representation  
**Subject:** Draft amendment to Hobart's planning scheme proposal

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I completely support the draft amendment to the City of Hobart's planning scheme, regarding restrictions on short term accommodation permits in residential areas.

All the evidence shows that short term accommodation is having an extremely detrimental impact on housing availability for locals. It is a housing crisis.

Sent from Android device

**From:** Emma Marson <emmajanemarson@gmail.com>  
**Sent:** Friday, 6 May 2022 8:13 PM  
**To:** Representation  
**Subject:** PSA-22-1

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern

I write in regards to the proposed amendment (PSA-22-1) regarding short stay accomodation in the Hobart area.

As a long term resident of Hobart I fully support any changes that serve to regulate and restrict the short stay accomodation industry, which is having such a detrimental effect on so many locals struggling to find affordable housing in an already overpriced market.

I believe restricting the practice of using housing stock as visitor accomodation would also support Hobart's economy in terms of driving tourists towards hotels, restaurants, etc. as well as ensuring that the city's suburbs retain their sense of community.

I appreciate the opportunity to put forward my opinion on this matter.

Regards

Emma Marson

**From:** Jordan Marson <jordanmarson@gmail.com>  
**Sent:** Friday, 6 May 2022 8:16 PM  
**To:** Representation  
**Subject:** PSA-22-1

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This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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To whom it may concern

I support the amendment to restrict new short stay accommodation in the Hobart area.

Regards  
Jordan Marson