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From: Stuart Gale [REDACTED]
Sent: Monday, 29 December 2025 8:57 AM
To: Taxpolicy Advice
Subject: Short Stay Levy Bill 2025

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Dear Sir/Madam,

Re: Draft Short Stay Levy Bill 2025 – Clarification for Purpose Built Accommodation.

I am writing to make a submission on the Tasmanian Government’s draft legislation introducing a 5% levy on short stay accommodation.

While I support the intent of improving housing affordability and increasing transparency in the short stay accommodation sector, the draft legislation lacks sufficient clarity regarding the treatment of purpose built short stay accommodation, particularly where such accommodation does not provide ancillary hospitality services such as breakfast.

As currently drafted, it is unclear whether purpose built accommodation developed, approved, and operated specifically for short term visitor use will be subject to the levy in the same manner as non commercial dwellings (such as homes or apartments diverted from the long term rental market).

This distinction is important. Purpose built short stay accommodation:

- Is not removed from the long term housing supply;
- Is developed under existing planning and commercial accommodation frameworks;
- Operates in direct competition with traditional visitor accommodation such as motels; and
- Does not create the same housing market impacts that the levy is intended to address.

In particular, the absence of breakfast or other hospitality services further differentiates these operations from hotels and bed and breakfast establishments, yet they remain clearly commercial in nature and purpose built for tourism.

I respectfully submit that the legislation should be amended to explicitly exempt purpose built short stay accommodation that:

- Is approved and constructed for short term visitor use; and
- Does not provide breakfast or similar hospitality services as part of the accommodation offering.

Clear legislative wording would provide certainty for operators, investors, and administrators, reduce the risk of inconsistent interpretation, and ensure the levy is appropriately targeted at accommodation types that directly affect the long term housing market.

I encourage the Government to clarify this exemption directly within the primary legislation rather than relying on future regulations or ministerial declarations.

Thank you for the opportunity to make this submission and for considering the need for clarity and fairness in the application of the proposed levy.

Yours sincerely,
Stuart Gale - Owner

Mount View Accommodation Marrawah