

Submission on Short Stay Levy Bill – Martha Vale Park

I welcome the opportunity to comment on the Short Stay Levy Bill (Consultation Draft).

The Tasmanian Planning Scheme operates on a clear use-based framework that distinguishes between residential use and visitor accommodation or tourism use. Many forms of visitor accommodation are approved on the basis that they cannot lawfully be used as dwellings, either permanently or intermittently. This distinction is fundamental to Tasmania's planning system and should be reflected in legislation responding to housing affordability pressures.

The Bill already acknowledges this principle by exempting hotels, motels, inns, bed and breakfasts, caravan parks and similar traditional visitor accommodation. These uses are generally purpose-built or approved solely for visitor accommodation and are not intended, nor permitted, to function as residential dwellings. This approach recognises that accommodation which does not contribute to residential housing supply should be treated differently from dwellings repurposed for short-stay use.

However, the Bill does not adequately consider or define the status of on-farm accommodation and other non-residential visitor accommodation that is approved under the Tasmanian Planning Scheme and prohibited from residential use. In many planning schemes, on-farm accommodation is tightly constrained, limited in scale, and expressly prevented from being used as a dwelling or long-term residence. Our on-farm accommodation is an example of such. We are prohibited to utilise accommodation for anything other than visitor accommodation Use. Unlike many other visitor accommodation on booking platforms, we do not have a dual use (Residential/Visitor Accommodation) attached to our business. Despite this, the Bill provides no clarity as to whether such accommodation is exempt.

As a result, accommodation that can never be used for residential purposes may be captured by the levy in the same way as dwellings removed from the long-term housing market. This appears to be an oversight rather than an intentional outcome of the policy design.

The stated purpose of the levy is to support housing affordability and first home buyers. Applying the levy to accommodation that cannot be converted to residential use and does not reduce housing supply does not advance this objective. On-farm and other non-residential visitor accommodation do not compete with the residential housing market and do not create the housing impacts the levy is intended to address.

It is therefore recommended that the Bill be amended to explicitly exempt accommodation that is prohibited from residential use under the Tasmanian Planning Scheme, including on-farm visitor accommodation, or otherwise define short stay accommodation in a manner that excludes premises that cannot lawfully be used as residential dwellings. This would improve alignment with Tasmania's use-based planning framework, provide regulatory clarity, and ensure the levy is applied consistently with its stated policy intent.

Kind regards,

Anna Williams

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