



Tasmanian Housing Strategy  
GPO Box 65  
HOBART TAS 7001

Via email: [tasmanianhousingstrategy@homes.tas.gov.au](mailto:tasmanianhousingstrategy@homes.tas.gov.au)

3 July 2023

Dear Housing Strategy Team

For many years we have been working with the Tasmanian Government on short term rental accommodation (STRA) – from the early days of the Government thinking through the mechanism for data collection, the implementation of regulations, through to now being able to consider the sector from the broader perspective of the current housing challenges.

I have spoken publicly and in many letters and submissions about the great example Tasmania has set in ensuring that it develops policy positions and regulatory mechanisms for the STRA sector based on actual data and analysis. In our view, the draft Housing Strategy is of a similar high standard.

Our goal in working with Governments around Australia has always been to find the right balance between the benefits of STRA against the issues that have been raised including impacts on availability of social and affordable housing. In our letter responding to the Housing Strategy Discussion Paper (dated 28 September 2022 and attached to this letter for ease of reference), we outlined key pieces of information and data on the STRA collected over decades of experience from working in the sector. These points remain relevant as the Government progresses towards finalising the Housing Strategy.

In specific response to the Draft Housing Strategy consultation, we make the following additional comments:

- The four key themes of the Strategy are well designed and considered. We support the balanced presentation of the individual issues related to the themes and in particular the considerations around STRA. We do reiterate though, the importance of recognising that there is an ongoing mismatch between the dwellings that qualify as affordable and the majority of homes that are used for STRA. We note that the current wording in the strategy document around *'exploring options to balance its [STRAs] impact on rental vacancy rates'* can be easily misconstrued, leading people to misunderstand that STRA has a significant impact on the availability of social and affordable housing options. As demonstrated by the Tasmanian Government's data set and as outlined in our earlier letter, this is not an accurate understanding of the STRA sector. To minimise the potential for this misunderstanding and to ensure that the solutions in the strategy match the goals, we suggest a minor word change to *'exploring options to balance ANY impact on rental vacancy rates'*.
- Under theme three – People at the centre, the topic of safety is presented with a particular focus on importance of programs that provide shelter accommodation or rapid rehousing for vulnerable families needing larger homes. This is an area where we believe the STRA sector may be able to assist and we make the offer for further discussions on this topic.



We value our engagement with the Tasmanian Government and look forward to this continuing as you work to finalise the Strategy and then begin its implementation. We would be pleased to discuss the STRA sector with you at any time. Please feel free to get in touch with me (on +61 428 933 130 or via [ecurry@expediagroup.com](mailto:ecurry@expediagroup.com)).

Regards,

A handwritten signature in dark purple ink, consisting of a large, stylized 'E' followed by a long, sweeping horizontal line that ends in a small upward curve.

**Eacham Curry**

**Director, Government & Corporate Affairs | Expedia Group**

Level 17, 1 Martin Place, Sydney, NSW 2000

P: +61 (0) 2 8090 6600 | M: +61 (0) 428 933 130

E: [ecurry@expediagroup.com](mailto:ecurry@expediagroup.com)

Attachment A: Expedia letter regarding the Tasmanian Housing Discussion Paper, dated 28 September 2022.



ATTN: Tasmanian Housing Strategy  
Department of Communities Tasmania  
GPO Box 65  
Hobart Tasmania 7001

By email: [Tasmanianhousingstrategy@communities.tas.gov.au](mailto:Tasmanianhousingstrategy@communities.tas.gov.au)

Dear Housing Strategy Team

Stayz congratulates the Tasmanian Government on this Housing Strategy Discussion paper. We wholeheartedly agree with the central tenet of this process – that every Tasmanian deserves a roof over their head. We are also encouraged that the discussion paper allows for multiple considerations in determining the best way forward and a recognition that this requires a fully informed understanding of the costs and benefits for all relevant entities and industries. There is no doubt that Tasmania needs a communitywide conversation about the aims and priorities of housing policy and the costs and benefits of a range of policy and regulatory options. This discussion paper starts that process.

Our top housing priority in Tasmania is to support policies and regulations that get the balance right in the use of accommodation. For us, this means:

- Ensuring arrangements for STRA that recognise many STRA homes will never contribute to the social and affordable housing solution and that to treat them as such takes away the contribution STRA makes to the visitor economy and local jobs for no benefit to the housing challenge. This scenario is particularly acute in regional Australia where the lack of traditional accommodation for tourists means that without STRA these areas miss out on the benefits of the tourist dollar.
- Meeting community expectations with regard to neighbourhood amenity relative to the community benefits from prosperous local economies and jobs.
- Influencing motivations of property investors through an appropriate mix of incentives and regulation. For every renter, there must be an investor. Where there is a public market failure, the private citizen can be incentivised to contribute to the solution by creating an environment where the private impact is minimised. While it appears recently that some councils and individual councillors around Tasmania believe that you can penalise and regulate STRA to a point where investors will turn their homes into long term rentals, there is a failure to contemplate the scenario that also appears to be playing out across Australia – if the costs and regulation exceed the benefits of owning an investment property, investors will leave the property market all together. In Tasmania, where home ownership is already above the national average, sitting over 70%, the outcomes of this scenario will be felt more acutely and more quickly.
- Making clear the goals and ambitions for tourism and social and affordable housing in Tasmania and the inputs that will be necessary to achieve these. We understand the significant challenges in getting the right balance between permanent housing, and accommodation that supports an economy that is more heavily reliant on visitors than any

other around Australia. This emphasises the need for community discussions and government leadership such as is being created through this process.

In considering the role STRA may play in contributing to a social and affordable housing solution, we have looked at the baseline figures, trends and other relevant Tasmanian Government policies, such as the T21 Visitor Economy Action Plan. There are a number that are highly pertinent inputs for ensuring appropriately targeted policies and regulation that will deliver the intended outcomes of Tasmania's Housing Strategy. These also provide a valuable insight into the absolute numbers that must be considered in making decisions on how to manage STRA.

- Tasmania's economy is more heavily reliant on tourists than any other Australian State and Territory. More than 13% of all jobs in Tasmania are created and supported by visitors.
- The Tasmanian Government had set a goal prior to COVID-19 of increasing visitor spend to more than \$2.5bn. There must be at least an equal increase in the provision of goods and services for visitors.
- Tasmania's population is growing quickly with an increase of more than 50,000 people over the five years between 2016 and 2020. At the national average household density of 2.5 people per dwelling, this increase alone translates to a need for an additional 20,000 homes – averaged at 4000/year. The current approvals and building rate delivers approx. 2000 new homes built/year.
- There are currently close to 4500 requests for social/affordable housing registered in Tasmania. And 5919 clients seeking accommodation support through Specialist Homelessness Services.
- There are currently 2777 whole home properties being used across Tasmania for STRA.

While there is much more data available that contributes to an understanding of the full housing challenge, those presented above are sufficient to show that even if every one of the whole homes currently being offered for STRA was turned into long term social and affordable rentals, it would not solve the problem. And another problem would have been created – loss of jobs, loss of business opportunity and loss of tourist dollars.

At this point it is also important to make clear that just a small proportion of the 2777 whole homes currently offered for STRA might be suitable for social and affordable housing. Looking across the Stayz inventory, a significant number of STRA homes in Tasmania are located in the most sought after tourist locations and are of a size and quality that precludes them from the affordable rental pool. And a further significant number are family holiday homes that are used regularly by the owners. This also precludes this type of STRA from being available for long-term rental.

It is increasingly apparent that in the absence of a proper articulation of the housing problem and the availability of public resources to address it, Councils are turning to STRA and presenting it as a quick fix. As can be concluded from the figures above, this could not be further from the truth. Even completely banning STRA does not provide a quick fix and at the same time ensures a compromised outcome for tourism, jobs and the local economy.

As has been the case over more than five years, Stayz remains committed to working with all levels of government to find the right balance between permanent housing and STRA. From our more than

# expedia group™

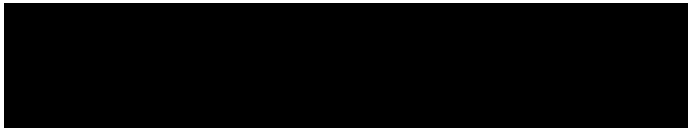
30 years of experience working in the tourism industry, we have valuable information and insights that we are prepared to share throughout this process. We also make the offer to work with you on creative solutions for the 4200 clients currently registered through Specialist Housing Services in need of short term and emergency housing. We believe that there is the potential to partner with the STRA industry to make life better for these clients.

Please do not hesitate to get in contact with me (on +61 428 933 130 or via [ecurry@expediagroup.com](mailto:ecurry@expediagroup.com)) with any questions or to speak further.

Regards,



**Eacham Curry**  
Director, Government & Corporate Affairs | Expedia Group



28 September 2022