

## **Secondary Residences**

### **Draft SPP Amendment 01-2026 of the State Planning Provisions**

# **City of Hobart Submission**

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**April 2026**

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## Executive summary

The City of Hobart (the City) welcomes the opportunity to provide feedback on the Draft SPP Amendment 01-2026 of the State Planning Provisions (SPPs) relating to secondary residences (the Draft Amendment).

The City supports:

- increasing secondary residence maximum gross floor area (GFA) from 60 m<sup>2</sup> to 90 m<sup>2</sup> to broaden design options and housing choice;
- clarifying that secondary residences should generally have the same use status as a single dwelling where this improves certainty for proponents and planning authorities; and
- retaining the principle that secondary residences remain subordinate and share services and access arrangements with the primary dwelling, subject to further planning pathways being made available for other forms of medium density housing.

As Hobart continues to experience acute housing pressures, the City recognises the potential role of secondary residences in:

- providing smaller, more adaptable dwellings for ageing in place and multi-generational living; and
- delivering additional housing supply within established areas that are already serviced by infrastructure.

However, given Hobart's distinct urban form (steep topography, constrained lots, heritage character precincts, and infrastructure capacity challenges), the City considers several aspects of the Draft Amendment warrant refinement or additional guidance to avoid unintended impacts on amenity, servicing and neighbourhood outcomes and regulatory burden for development proponents and the City alike.

## Summary of Recommendations

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- **Provide additional guidance to support consistent interpretation.**
- **Provide clear practice guidance to design that considers amenity, cumulative effects and consistent interpretation across Councils.**
- **Ensure the proposed secondary residence amendments are considered within the scope of the parallel SPP design standards review process.**

## **Recommendation 1: Consistent interpretation**

### **Provide additional guidance to support consistent interpretation**

The City supports increasing maximum GFA to 90 m<sup>2</sup> to enable more functional, adaptable small homes and broaden household options.

That said, at 90 m<sup>2</sup>, a secondary residence can increasingly resemble a small standalone dwelling in both function and built form. The definition continues to rely heavily on qualitative concepts (“appurtenant and subordinate”) alongside service sharing requirements, which may not be applicable where there are no-reticulated services.

In established suburbs with smaller lots and strong character values, a larger secondary residence may generate outcomes that feel and operate like dual occupancy, without necessarily being assessed as such in all circumstances where “No Permit Required” pathways apply.

Further, in vegetated foothill suburbs and bushfire prone landscapes, additional dwellings can increase:

- clearance pressure;
- asset protection zone expectations; and
- cumulative hazard exposure (more people on site, potentially more evacuation demand).

In 2021, the Tasmanian Government published the ‘Adding extra living quarters to your home’ brochure as a guide to creating ancillary dwellings in Tasmania. The guide provides explanatory information about the benefits of ancillary dwellings, resources to assist with the design, planning and construction process and frequently asked questions. However, beyond a set of high-level design principles, it does not provide sufficient detailed guidance to support the interpretation of the planning requirements for secondary dwellings.

### **Detailed recommendation**

Ensure code guidance, where possible, and publish a practical and plain-English guide for the community and practitioners, including:

- a clear explanation of when a permit is or is not required under the Use Tables.
- how “subordinate and appurtenant” is to be interpreted at 90 m<sup>2</sup>, such as:

- whether subordination is primarily a floor area relationship to the primary dwelling, or a broader test (e.g. siting, scale, access legibility, private open space allocation); and
- how decision makers should treat proposals where the secondary residence is similar in size to the existing dwelling (common where the primary dwelling is small).
- acceptable servicing arrangements where sewer is not available, including:
  - how “shared services” is demonstrated where there is no reticulated sewer;
  - whether additional on-site wastewater capacity is treated as “separate connection” in effect;
  - how compliance is enforced over time if services are later modified; and
  - examples of compliant service arrangements.
- “secondary residence vs multiple dwelling” distinctions;
- parking expectations and good practice, including demonstration of functional shared parking/access where practicable; and
- how proponents should reconcile secondary residence delivery with vegetation retention and hazard management objectives in constrained, vegetated settings (especially in priority vegetation areas), including best practice siting to minimise clearance while meeting safety.
- considerations around the placement and configuration of shared open space, parking and communal amenities (including bins and other storage) to ensure privacy and amenity are retained for the residents of each dwelling.

This will:

- minimise heightened community concern around medium density housing in heritage/character areas if changes are perceived as unregulated dual occupancy;
- reduce inconsistent interpretation across planning authorities and Council’s compliance workload; and
- avoid unintended conversion of secondary residences into effectively independent dwellings via later service separation.

## Recommendation 2: Cumulative effects

### **Provide clear practice guidance to design that considers amenity, cumulative effects and consistent interpretation across Councils.**

The draft amendment clarifies secondary residences may fall within “No Permit Required” qualifications in several zones (by inserting “or a secondary residence” alongside “single dwelling”).

The explanatory document notes that existing zone and code standards (height, setbacks, privacy, landscaping, open space etc.) will continue to apply and that secondary residences are assessed against the same requirements as the single dwelling on the site.

The City’s practical experience in inner urban Hobart is that amenity impacts often arise from the cumulative intensity of development on constrained sites (overshadowing, overlooking, hardstand runoff, reduced deep soil, waste storage, and service arrangements), even where individual elements meet minimum numeric standards.

Where an approval pathway is “No Permit Required”, Council has limited ability to:

- manage cumulative site intensity;
- ensure site servicing and waste arrangements are workable; or
- mediate neighbour impacts early (especially where construction is close to boundaries).

### **Detailed recommendation**

The City recommends the following:

- Consider whether the SPPs standards proposed in the *Making it easier to develop medium density housing Discussion Paper* will protect the amenity of existing residential use and ensure adequate private open space and deep soil planting is provided when new residential development is proposed.
- Provide clear practice guidance to design ‘good housing’ in a similar way to the Medium Density Design Guidelines and to ensure consistent interpretation across councils.

## **Recommendation 3: Parallel SPP reviews**

### **Ensure the proposed secondary residence amendments are considered within the scope of the parallel SPP design standards review process**

The draft Amendment proposes inserting “secondary residence” into clause 30.4.1 A1(b) relating to buildings and works on a lot not more than 1,000 m<sup>2</sup>. Without the full clause context in this submission, the City flags a risk that inserting secondary residences into a lot size based acceptable solution may:

- inadvertently exclude appropriate proposals on lots larger than 1,000 m<sup>2</sup> (where impacts could be managed);
- create an assumption that secondary residences are only expected/appropriate below that threshold, which may not match Hobart’s variable lot patterns (including larger inner suburban lots suitable for gentle infill); or
- may compromise existing potential of Inner Residential and General Residential zoned site’s ability to be developed for multiple dwellings in the future.

The State Planning Office is also reviewing the residential development standards within the State Planning Provisions (SPPs), including a reduction of minimum lots sizes, and a shift to plot ratio standards to create planning pathways for multiple dwellings. Early documents, developed for consultation, do not incorporate the proposed draft Amendment.

Further, the Council supports the draft Amendment maintaining the requirement that a secondary residence remain subordinate to a primary single dwelling on the site as a means of supporting affordable rentals and multi-generational housing. However, as secondary residences cannot be strata titled, the addition of secondary residences will likely inflate the developed properties value and restrict access of secondary residence ownership to existing homeowners.

### **Strategic infill capacity and future multiple dwelling potential**

In many parts of Hobart particularly, within the Inner Residential and General Residential Zones larger, well-located residential lots represent some of the City’s most important opportunities for medium density infill and renewal. These areas are typically close to activity centres, employment, services and public transport, and are central to achieving metropolitan consolidation objectives.

The City is concerned that permitting larger secondary residences (up to 90 m<sup>2</sup>), particularly as detached structures, could in some circumstances:

- occupy the optimal building envelopes for future multiple dwellings;

- lock in site layouts, access arrangements or service configurations that make later comprehensive redevelopment more complex or less feasible; and
- reduce the economic viability of future multiple dwelling development by fragmenting site capacity or introducing additional demolition and re-servicing costs.

Over time, this may result in incremental under-development of strategically located sites, where land that could otherwise support higher-yield, well-designed multiple dwellings instead becomes constrained by earlier secondary residence outcomes.

This issue is particularly relevant in Hobart where:

- lot consolidation opportunities are limited by fragmented ownership patterns;
- steep topography already constrains site planning and access;
- infrastructure upgrade costs can be significant; and
- few sites are available that can readily transition from single dwellings to multiple dwellings without careful sequencing of development.

In these circumstances, the siting of a relatively large secondary residence may unintentionally compromise the City's ability to deliver future housing density in locations best suited to it, even though such sites are expressly zoned to encourage more intensive residential development.

## **Detailed recommendation**

The City recommends that:

- the SPO ensure that the inclusion of secondary residences within A1(b) does not unintentionally constrain well-sited secondary residences:
- the parallel SPP design standards review process:
  - incorporates the secondary residence draft Amendment
  - creates pathways for small scale strata housing typologies
- SPO consider the cumulative and strategic implications of larger secondary residences within Inner Residential and General Residential zones.

Doing so will ensure that secondary residences support the objectives of the Tasmanian Planning Policies to deliver density infill and housing diversity.