



22nd July 2026

Tasmania Planning Commission
GPO Box 1691
HOBART Tasmania 7001
Email: tpc@planning.tas.gov.au

Dear Planning Commission,

South Hobart Sustainable Community is grateful for the opportunity to comment on the Tasmanian Planning Commission's Draft State Planning Amendment 01-2026- Secondary Residence.

We note the following items in relation to the proposed Draft Amendment:

1. 'Single dwelling' is potentially a misleading term given that the definition within the SPP's for 'dwelling' () indicates that it may contain more than one residence, and that these may be separate structures:
(refer pg 6) "...the secondary residence forms part of the single dwelling..." , so it would appear to be deemed inclusive by definition. Yet in the very next paragraph (also pg 6) "...A secondary residence can be...a separate structure to the single dwelling."

This could be taken to imply, somewhat erroneously, that a secondary residence can be separate to a primary dwelling with secondary residence. This requires clarification and we would suggest that the term 'secondary residence' implies that there is a 'primary residence' so this would be a preferred term, and that the word 'dwelling' or 'single dwelling' is retained as the umbrella term for the legal definition of all residences in a non-'multi-dwelling' scenario.

Given the above, then in Amendment 2 – Item No 4: Are the terms 'dwelling' and 'single dwelling' taken to mean different things? If not then please edit this to ensure consistency of the use of the preferred terminologies.

2. OPPORTUNITIES

We support, in principle, the size increase for a secondary residence from a maximum of 60m² gross floor area to that of 90m² for the following reasons:

- Increased opportunity for families to utilise these as homes.
- Increased flexibility for children that receive shared parenting (blended families)
- Greater scope for the current retiring generation to downsize (secondary residence) and to potentially be on the same property as their children (primary residence).
- Increase in urban and suburban density while utilising existing infrastructure.
- Greater affordability for those with temporary or long-term financial restrictions.



3. CHALLENGES

While there are many perceived benefits to both an increase in the number (uptake) and size of secondary dwellings, we note that the following challenges will need consideration:

- The increase in maximum size from 60m² to 90m² may be both beneficial and without consequence on larger properties, but in both urban and suburban areas this will have the potential to create the following issues:
 - loss of green space which reduces external living area, tree cover and habitat.
 - increase in impervious surfaces (roof + car parking) contributing to impact on stormwater during significant rainfall events.
 - reduced amenity through loss of privacy with potential overlooking issues from/to properties.
 - increased waste generated vs number of bins allocated for kerbside rubbish removal in municipal areas.
 - ownership limitations, while necessary in preventing the circumvention of subdivision regulations, don't provide a mechanism for future ownership, but there might be consideration of a minimum period of tenure post-construction of secondary residence, after which the owner of the property may be eligible to apply for a change of use from secondary dwelling, with the understanding that this may be prohibitive in many circumstances due to inherent site restrictions on parking or on the cost of the separate provision of utilities.
 - secondary dwellings may readily qualify as permit-free 'short-term accommodation' under the home-sharing rule of a maximum of 4 bedrooms (provided the primary residence is the place of residence of the owner) which, while beneficial to both owner and community, may undermine the efforts to increase the availability of long-term accommodation.
- Local infrastructure could become strained due to incremental additional demand of older utilities that may fall short of current usage requirements eg. old (small gauge) connections to mains leading to lower water pressure, power-board needing upgrade/replacement, further reliance on old (terracotta) sewer, etc.
- Due to siting of these structures, a higher proportion of these secondary residences won't be able to gravity feed to stormwater or sewer (dependent on mains locations) and will require septs or pumped services, which may trigger greater planning issues, and/or cost, particularly if dwellings are on small parcels of land.
- As it stands, the creating of a secondary residence under an existing house triggers a change in building classification from Class 1 to Class 2 due to deemed fire source vertical orientation. This in itself necessitates extra approval as well as construction costs, as local authority fees are greater for Class 2 (multi-res), so the intent to provide greater affordability through a secondary residence is partially negated.
- There may be conflict with the pets of owners of the primary dwelling and those renting the secondary dwelling.



CONCLUSION

There is an overwhelming benefit to the use of secondary dwellings in Tasmania, and the proposed increase to the maximum size of these will further assist in expanding the number available residential rentals in this state, as well as allowing many home-owners to capitalise on their own property instead of, or ahead of, considering the purchase of an investment property.

This increase, however, is proposed to be provided across all residential properties with an amendment to regulations that have been kept deliberately simplistic but unfortunately provide limited to no capacity to assess each application on merit.

As the sizes of these secondary residences increase, the shortcomings of this approach will, on occasion, outweigh the benefits – with this most likely to occur in built up areas where there is increased likelihood of loss of amenity.

Rather than the 'one size fits all' approach we would recommend the added introduction of some succinct developmental constraints based on, but not limited to, the following circumstances:

1. Attached secondary dwellings with same footprint (eg. utilising space under or over primary residence)
2. Attached secondary dwellings with increased footprint
3. Detached secondary dwellings

All properties to retain a minimum soft-landscaped space.

All properties to adhere to a maximum proportion of site coverage

The larger the property's land area (m²) the less the restrictions should be.

Opposingly, the smaller the property's land area the greater the constraints, and it may be that the full 90m² is not achievable in all circumstances.

Overall we see an increase to 90m² as a positive move but as the impacts are increased it should by its nature require greater constraints.

We thank you for inviting our feedback on the Draft State Planning Amendment 01-2026- Secondary Residence and trust it is helpful in some way.

If it would help to discuss this submission in further detail, feel free to contact us via secretary@southhobart.org.au to arrange this.

Yours sincerely,

Aaron Leeman-Smith
Acting Secretary
South Hobart Sustainable Community

secretary@southhobart.org