

Our ref: Draft SPP Amendment 01-2026
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Tasmanian Planning Commission
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Dear Tasmanian Planning Commission

Draft Amendment 01-2026 of the State Planning Provisions – Secondary Residences

Thank you for the opportunity to provide feedback on draft amendment 01-2026 regarding secondary residences.

The need for increased residential density and provision of affordable housing is recognised as a key priority. The State Planning Office has undertaken substantial work to facilitate these aims, through the Medium Density Design Guidelines, Improving Residential Standards and current Medium Density Housing projects. However, the proposed amendment to secondary residence definition does not align with the strategic directions and solutions identified through these other projects.

Council officers do not support the proposed amendment to increase the allowable size of secondary residences by 50%, from 60m² to 90m². An additional 30m² would allow for 2 – 3 additional bedrooms¹, resulting in 3-4 bedroom homes as ‘secondary residences.’ It is noted that although the supporting report mentions that larger secondary residences are common in other jurisdictions, no supporting examples are provided. The proposed increase would reduce amenity outcomes and distribute increased density without delivering a shift in housing typology or strategic consolidation around services.

The change would see the role of secondary residences drift further from the original intent of ‘granny flats’ supporting extended families, towards being de facto multiple

¹ There’s no minimum floor area for a habitable room in the NCC; according to Buildsearch (<https://buildsearch.com.au/average-room-size>), in Australia the average bedroom is 14m², although ‘minor bedrooms’ may be as small as 7m² (2.8mx2.5m).

dwelling (each with potential multi-family occupancy). This shift also minimises the level of consideration given to issues such as privacy, amenity, area per dwelling, fire separation, car parking or strata potential. This is expected to result in:

- reduced residential amenity and quality of living;
- substandard infill undermining the delivery of quality medium density housing;
- additional density (number of bedrooms) in areas that may not be well located to transport and services;
- increased reliance on on-street parking;
- complications for waste management and collection, noting that Council does not currently provide a collection service for secondary dwellings;
- confusion for purchasers regarding strata potential; and
- may ultimately lead to pressure to enable strata division with retrofitting of secondary residences where the development has not been appropriately designed for separate ownership.

There may also be negative outcomes from Visitor Accommodation utilising a secondary residence of significant size but not provided with parking or designed to address on and off-site amenity impacts.

Therefore, Council officers strongly advocate that any proposed changes to secondary residences be postponed and coordinated with the imminent changes to facilitate improved typologies for quality medium density housing in suitable locations. Council officers will provide separate comments on the consultation draft of the medium density housing changes, however Council is generally supportive of well-considered measures to prioritise increased density consolidated around high frequency public transport corridors and activity centres. In this context, the proposed amendment to secondary residences risk undermining that goal.

Nevertheless, if this amendment is pursued, the following modifications are sought.

Issue	Recommendation
The terms 'appurtenant' and 'subordinate' ² are not used elsewhere in the planning scheme, are qualitative and may cause ambiguity. For example, larger secondary residences are more likely to	Modify the amendment to Table 3.1 to: • specify at (a) that a secondary residence has a gross floor area not more than 90m² or 30%³ of the area of

² Although 'appurtenant' is an existing term in the definition, it is not used elsewhere in the SPPs. The term 'subordinate' is not currently used in the SPPs.

³ Within the Glenorchy municipality, dwelling sizes on average are estimated at ~180m², noting that although modern dwellings are typically larger than older housing stock, the average floor area of new houses in Tasmania in 2021-2022 was 182.4m² (<https://www.abs.gov.au/articles/average-floor-area-new-residential-dwellings>). The current 60m² maximum equates to around 1/3 of the average dwelling area.

house families or share houses, with a corresponding demand for separated private open space; does this prevent ‘appurtenance’ or ‘subordination’? Instead, inclusion of a requirement for proportionality to the main dwelling would help address the intent of the clause. The use of proportions to ensure that the secondary residence is subordinate to the primary residence is used in NSW. For example, the Central Coast Local Environmental Plan specifies that the <i>“total floor area of the (secondary) dwelling, excluding any area used for parking, must not exceed whichever of the following is the greater –</i> (a) 60 square metres (b) 30% of the total floor area of the principal dwelling” Central Coast Local Environmental Plan 2022 - NSW Legislation This standard differs between Councils but is typically within the range of 25-40%. It is proposed that the draft standard refers to “whichever is the lesser” if the increase to 90m² goes ahead as this would better reflect the relationship in size between the primary and secondary residence where the primary residence is modest in size.	the primary residence, whichever is the lesser; and delete clause (b) or, if retained, replace the terms ‘appurtenant/ subordinate’ with ‘adjacent/ subservient’ (which are used elsewhere in the SPPs).
Allowing for more substantial dwellings as secondary residences may conflict with the purpose of zones where Residential use is more limited.	Consider making secondary residences Discretionary in the following zones: - Low Density Residential - Future Urban Zone (with a corresponding use standard) - Agriculture Zone
The amendment highlights an existing anomaly whereby the Rural Zone (purpose	Should the amendment also address this anomaly?

being to provide for a range of uses) only allows single dwellings but the Agriculture Zone (purpose being to provide for agricultural use) allows discretion for any type of Residential use.	
Reference to a secondary residence being located on the same lot as a single dwelling does not account for sites where two or more lots are adhered.	Consideration should be given to any requirements for secondary residences on adhered lots.

Please contact me if you have any questions regarding this submission.

Yours sincerely



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