
From: State Planning Office Shared Mailbox <SPO@stateplanning.tas.gov.au>
Sent: Tuesday, 8 September 2026 2:04 PM
To: TPC Enquiry
Subject: SPP Draft Amendment 01-2026 - SPO responses to representations
Attachments: Attachment 1 - SPP Draft Amendment 01-2026 - SPO responses to representations.pdf;
State Planning Office - SPP amendment 01-2026 - Hearings - Letter to Commission - 8 September 2026.pdf

Good afternoon TPC,
Please see attached correspondence from Sean McPhail, Acting Director, State Planning Office.
Many thanks,
Helen

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8 September 2026

Mr John Ramsay
Executive Commissioner
Tasmanian Planning Commission
GPO Box1691
Hobart TAS 7001

By email: tpc@planning.tas.gov.au

Dear Mr Ramsay,

State Planning Provisions - Draft amendment 01-2026 Submission to Hearing

I refer to the Tasmanian Planning Commission (the Commission) hearing scheduled for 16 and 17 September 2026 to assist consideration of Draft Amendment 01-2026 of the State Planning Provisions under section 30M of the *Land Use Planning and Approvals Act 1993*. I would like to provide a submission regarding issues raised in representations for the Commission's information prior to the hearing.

Attachment 1 outlines the State Planning Office's (SPO) responses to each of the issues raised in the 17 representations to the draft amendment published on the Commission website. No revisions to the draft amendment are recommended in response to the representations.

SPO representatives will attend the hearing, however should you have any enquires in the meantime, please contact Claire Wolf by phone on 1300 703 977 or email SPO@stateplanning.tas.gov.au

Yours sincerely

Sean McPhail
Acting Director

Attachments:

1. Draft Amendment 01-2026 of the SPPs - SPO responses to representations

Attachment 1

Draft Amendment 01-2026 of the State Planning Provisions (SPPs) State planning Office (SPO) responses to representations

Background

The draft SPP amendment 01-2026 was placed on public exhibition from 10 June 2026 to 22 July 2026. Details of the amendment were displayed on the Tasmanian Planning Commission (the Commission) website and representations lodged with the Commission.

Draft amendment 01-2026 of the SPPs proposes to make changes to provide greater flexibility for secondary residences (often referred to as ancillary dwellings or granny flats) by increasing the allowable gross floor area from 60m² to 90m². The draft amendment also proposes a variety of changes to clarify the requirements for secondary residences.

The draft amendment proposes to:

1. Clarify the secondary residence definition and increase the allowable gross floor area for a secondary residence to 90m².
2. Clarify Use Tables to specify that the status of a secondary residence is the same as a single dwelling.
3. Clarify a Future Urban Zone standard applies to a secondary residence the same as single dwelling.
4. Clarify Parking and Sustainable Transport Code standards apply to a secondary residence the same as a single dwelling and that no dedicated parking space is required for a secondary residence.
5. Clarify Natural Assets Code standards apply to a secondary residence the same as a single dwelling.

The purpose of the draft amendment is to implement the Tasmanian Government's commitment to increase the allowable size of granny flats from 60m² to 90m² by revising the definition for secondary residence. It is not intended to change the operation of the planning scheme and how secondary residences are currently assessed.

During the exhibition period, seventeen representations were received from:

1. Ken Thomason
2. Will Perry
3. Glenorchy City Council
4. Housing Industry Association Ltd
5. Sorell Council
6. King Island Council
7. Selena Dixon
8. Meander Valley Council
9. Council on the Ageing Tasmania
10. Clarence City Council
11. Hobart City Council
12. Northern Midlands Council
13. West Tamar Council

14. Flinders Council
15. Planning Institute Australia
16. Tasman Council
17. South Hobart Sustainable Community

Summary of the issues raised in representations and SPO responses

Overall, there is a high degree of support for the proposed secondary residence increase in gross floor area to 90m², both through this round of public consultation and submissions that were provided during the preparation phase of the draft amendment under section 30D of the *Land Use Planning and Approvals Act 1993* (the LUPA Act). Those opposing the floor area increase raise concerns including strategic impacts, confusion between single and multiple dwelling development, increasing demand on infrastructure and council services, and impacts on amenity. Some concerns were also raised about the proposed clarifications to Use Tables, select zone and code standards and parking requirements.

Some representations recommended specific revisions. No change to draft SPP amendment 01-2026 is recommended in response to the issues raised in representations.

A summary of the issues raised in representations and SPO responses is provided in the table below.

Submission	Summary of Issues Raised	SPO Response
1-Ken Thomason	Support the draft amendment, noting that it will provide more flexible, functional and accessible housing options to meet the contemporary housing needs of Tasmanians and promote ageing in place and sustainable design	Support noted. No change to draft SPP amendment 01-2026 is recommended.
2-Will Perry	Acknowledges that the amendment would deliver a range of benefits to many Kingborough residents by increasing the options for housing solutions including providing for fully accessible and compliant designs in consistent with the NDIS Specialist Disability Accommodation standards.	Support noted. No change to draft SPP amendment 01-2026 is recommended.
3- Glenorchy City Council	Does not support the proposed amendment. Increasing the allowable size of secondary residences by 50% contradicts current strategic planning goals for medium density housing. The change would allow for 3–4-bedroom homes as secondary residences resulting in: • reduced residential amenity; and • substandard infill undermining the delivery of quality medium density housing.	It is not accepted that a functional 3-4 bedroom home could be designed to meet building requirements within 90m² gross floor area. A 1 or 2 bedroom home with additional space for amenities, living, working, storage, energy efficient design including wall insulation or small 3 bedroom are possibilities. The development potential of a site for a single dwelling with a secondary residence remains similar to that for a large single dwelling. All development is subject to the same building height, setbacks (including building envelopes, where relevant), and site coverage requirements. It is also accepted that the opportunity for a 90m² secondary residence may not be able to be fully realised in all circumstances.

Submission	Summary of Issues Raised	SPO Response
		It is not intended to change the current operation of zone standards for single dwellings which ensure development consistent with the zone purpose, site conditions, scale and character objectives.
	3–4-bedroom homes as secondary residences would result in: • compliance issues with waste management and collection • additional density in areas that may not be well located to transport and services • increase reliance on on-street parking	Secondary residences remain modest in scale consistent with what can be developed as a single dwelling on a lot. Operational impacts are expected to be manageable. The secondary residence is expected to share the same waste and recycling bins as the single dwelling on the site. The single dwelling and secondary residence are intended to share the available on-site parking the same as a larger single dwelling. The choice to have more on-site parking spaces is available to landowners. The Parking and Sustainable Code allows for assessment of additional parking to support a single dwelling and secondary residence. The approach to parking space numbers reflects the requirements for a dwelling in the General Residential Zone where no more than 2 parking spaces are required per dwelling regardless of how many more bedrooms there are (above two). These parking rates are considered appropriate for lower-density housing, such as large single dwellings, and areas where people depend on cars. There is strong support for the benefits of keeping parking space requirements minimal on sites constrained by existing development where land is limited, to maximise the available land for housing and minimise development costs.
	Confusion for purchasers regarding strata potential and pressure to enable strata division with retrofitting of secondary residences where the development has not been appropriately designed for separate ownership	Secondary residences are not intended for separate ownership from a single dwelling. The single dwelling and secondary residence provisions are not intended to provide for strata division, particularly with services required to be shared. The draft amendment does not alter any operation between the planning, building, and strata titling systems currently in place. A single dwelling with secondary residence on a lot is distinct from 2 multiple dwellings on a lot. Multiple dwellings have separate use and development requirements under the planning scheme and separate connections to services which enable them to be strata titled. To separate a secondary residence from the single dwelling would normally require that

Submission	Summary of Issues Raised	SPO Response
		all of the requirements for use and development of multiple dwellings on the lot can be met, as well as all building requirements and approvals prior to requesting approval of strata division under the Strata Titles Act 1998. The scope of the draft amendment in the Terms of Reference does not provide for consideration of broader issues such as strata titles or multiple dwelling developments.
	There would be amenity impacts if secondary residences are used for visitor accommodation with no parking space provided	There are separate regulations in the planning scheme for managing impacts of various scales of use and development for Visitor Accommodation. The approach to parking space numbers reflects the requirements for a dwelling in the General Residential Zone. These parking rates are considered appropriate for lower-density housing, such as large single dwellings, and areas where people depend on cars. The single dwelling and secondary residence are intended to share the available on-site parking the same as a larger single dwelling.
	Suggests the following changes if the amendment is to be pursued: 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% of the area of the primary residence, whichever is the lesser and • delete clause (b) or, if retained, replace the terms appurtenant/subordinate with adjacent/subservient	The terms of reference issued by the Minister require increasing the allowable gross floor area for secondary residences from 60m² to 90m². The draft amendment is not intended to otherwise constrain or alter the metric for potential size of a secondary residence. The term “appurtenant” is already used in the definition for secondary residence in the SPPs. The term is commonly used in property law to refer to something attached to or associated with a main property. It commonly describes rights, features, or improvements that are considered part of the property, such as easements, garages, fences, or access ways, and that transfer with the property when it is sold. Essentially, an appurtenance is a secondary or accessory part of a primary property, and in that sense appropriately describes the relationship of a secondary residence to a single dwelling. The suggested term adjacent is not considered a suitable replacement. Clause 3.0, Table 3.1 of the SPPs contains the definitions: Adjacent - means near to, and includes adjoining. Adjoining - means next to, or having a

Submission	Summary of Issues Raised	SPO Response
		common boundary with. The planning scheme's defined meaning of adjacent does not convey the intended meaning of appurtenant in the secondary residence definition.
	Consider making secondary residences Discretionary in the following zones: • Low Density Residential • Future Urban Zone (with a corresponding use standard) • Agriculture Zone Notes the amendment highlights an existing anomaly whereby the Rural Zone (purpose 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. Should the amendment also address this anomaly?	The Terms of Reference for the amendment do not allow for consideration of these matters. The existing Use Class status and assessment pathways for a single dwelling with secondary residence are not intended to be changed.
	Consideration should be given to any requirements for secondary residences on adhered lots.	The requirement in the definition that a secondary residence and is located on the same lot as a single dwelling may mean that there is little opportunity for adding a secondary dwelling on adhered lots. While the intent is not to specifically exclude any circumstances where the secondary residence requirements can be met, it is accepted that the opportunity may not be fully realised in all circumstances due to a variety of existing constraints. The SPPs are intended to apply to the majority of cases statewide, introducing added complexity to provisions to suit specific rarer cases is not recommended. It is understood that there would be a subdivision process for combining lots as another alternative option open to owners to enable a secondary residence to overcome an existing set up across the adhered lots, although this would involve more complexity and expense to achieve.
4- Housing Industry Association (HIA)	Supports the proposed increase in the maximum floor area for secondary residences to 90 square metres: • Assists addressing housing affordability and supply challenges • Current size limitations can constrain the functionality and versatility of secondary residences • Will have greater flexibility to create homes that better meet the needs of occupants while remaining subordinate	Support noted.

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	to the primary dwelling The proposal will allow for more practical floor plans with larger living spaces, improved storage solutions and greater flexibility in room layouts. Importantly, it will create opportunities to incorporate accessible design features, making these homes more suitable for older Australians seeking to age in place and for households with changing mobility needs	
	Site coverage controls should be reviewed, noting that where site coverage limits are already restricted to fifty per cent (50%), property owners may be unable to fully utilise the proposed 90 square metre allowance in the manner intended by this reform	It is accepted that the opportunity for a 90m² secondary residence may not be able to be fully realised in all circumstances. It is not intended to change the current operation of zone standards for single dwellings which ensure development consistent with the zone purpose, site conditions and character objectives.
	Questions the need the definition to be revised to specify that a secondary residence is not only appurtenant but also subordinate to the main residence. Concern these are subjective qualifiers that may complicate interpretations	Appurtenant is commonly used in property law to refer to something attached to or associated with a main property. The word 'subordinate' is added to the existing definition that includes the term "appurtenant" to further explain the intent that a secondary residence is an additional subservient home that goes with the main house. The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome.
5- Sorell Council	The community has not raised any concern with existing arrangements for secondary residences to warrant the proposed amendments The draft amendment would be at odds with the Tasmanian Housing Strategy which identifies a lack of housing diversity for one- and two-bedroom dwellings. The supporting material does not explain why a change is needed or what potential issues may arise from a larger floor area A 90m² floor area will lower distinctions between multiple dwellings and secondary residences Concern that secondary residences will be a mechanism to circumvent multiple dwelling standards	The explanatory document for the draft amendment explains the government's policy commitments and strategic alignment with the Tasmanian Housing Strategy 2023-2043 and TPPs. This includes providing more housing options to satisfy community needs for well designed one and two bedroom dwellings. The distinctions in the planning scheme between multiple dwellings and a single dwelling with secondary residence remain the same. Potential planning issues with development of secondary dwellings will continue to be managed in the same way that the impacts of a larger single dwelling are assessed under the relevant zone standards.
	The terms appurtenant and subordinate are ambiguous and do not assist with consistent statewide application and clarity for applicants	Appurtenant is commonly used in property law to refer to something attached to or associated with a main property. The word 'subordinate' is added to the

Submission	Summary of Issues Raised	SPO Response
		existing definition that includes the term “appurtenant” to further explain the intent that a secondary residence is an additional subservient home that goes with the main house. These terms are used to convey that a secondary residence is not intended to be separated from a single dwelling on the same lot, and helps to clarify the difference between this development and multiple dwellings. This clause is not intended to be a comparative measure of size between the single dwelling and secondary residence; the size requirement of a secondary residence is given in the definition leading sentence. The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome.
	Suggests the draft amendment should reconsider the proposed car parking provisions, noting the requirement for parking to be shared is supported	Support for shared parking is noted. The approach to parking space numbers reflects the requirements for a dwelling in the General Residential Zone. These parking rates are considered appropriate for large single dwellings in areas where people depend on cars. The single dwelling and secondary residence are intended to share the available on-site parking the same as a larger single dwelling.
6-King Island Council	Supports the proposed amendment noting that it will provide flexibility to additional housing opportunities and supports the efficient use of existing residential land and infrastructure. The proposed clarification regarding servicing arrangements for properties using on-site infrastructure better reflects the circumstances commonly encountered in regional and remote parts of Tasmania, including King Island. Council agrees that the proposed amendments do not fundamentally alter the operation of the planning scheme but provide greater certainty for applicants, planners and the community regarding the intended treatment of secondary residences. The clarification that secondary residences remain part of a single dwelling arrangement, share access and parking arrangements, and are distinguished from multiple dwellings assists in maintaining the integrity of the existing planning framework.	Support noted

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7-Selena Dixon	Support the proposed increase from 60m² to 90m² as it will provide flexibility for households seeking other housing options. Concern about the interaction between secondary residences and the site coverage Acceptable Solution under the Rural Living Zone provisions and outlined the following issues: • Under clause 11.4.1 A1, the 400m² site coverage limit in the Rural Living Zone creates an anomaly by allowing less built area than the 30% limit under clause 10.4.4 A1 on a minimum 1500m² lot under clause 10.6.1A1 under the Low Density Residential Zone. • On large Rural Living lots that already accommodates a main building and outbuildings, the 400m² limit leaves little to site coverage under a permitted pathway for a new secondary residence. • Without adjusting the Rural Living Zone acceptable solution, the increase of the secondary residence floor area to 90m² will be compromised • recommend that clause 11.4.1 A1 in the Rural Living Zone be amended to increase the maximum site coverage from 400m² to 490m² • this will provide a clearer and more enabling planning pathway for appropriate secondary residences on Rural Living land. • I support SPP Amendment 01/2026 and suggests a consequential amendment to the Rural Living Zone site coverage standard so that the proposed increase to 90m² can be implemented effectively, affordably and fairly across relevant zones.	Support noted The RLZ and LDRZ have different purposes and intended character, including for intensity of residential development, reflected in the varying zone standard requirements. It is accepted that the opportunity for a 90m² secondary residence may not be able to be fully realised in all circumstances. It is not intended to change the current operation of zone standards for single dwellings which ensure development consistent with the zone purpose, site conditions and character objectives. No change recommended.
8- Meander Valley Council	Supports the proposed amendment but concern that: • the inclusion of the 'secondary residence' within all zones use tables could be interpreted that it can be applied individually without having an existing single dwelling. • Inserting the 'secondary residence' in use tables and clauses within the SPPs will either result in inconsistencies between the SPPs and Local Provision Schedules Recommended the removal of 'secondary residence' within the zone use tables	The term secondary residence is a defined term in the planning scheme. The proposed definition links the secondary residence to being located on the same lot as a single dwelling. The defined term single dwelling means a dwelling on a lot on which no other dwelling, other than a secondary residence, is situated. Together these definitions operate to avoid misinterpretation of the use table that a subset of a single dwelling can be developed separately, similar to the way a home-based business use is separately listed in use tables but is linked to the existence of a dwelling by its definition.

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		If only one dwelling on a vacant lot were proposed in an application it would be assessed as a single dwelling. A single dwelling and secondary residence on a vacant lot could be proposed and assessed in one application.
	The use of the terms “same lot” and “same site” in the definition of a secondary residence and the explanatory documents is confusing and inconsistent as the terms have different meaning and application in the planning scheme. Highlighted that electricity and gas connections cannot be checked or controlled by Council and therefore, the requirement appears to hold no use.	The draft amendment only proposes to use the defined term ‘lot’, not ‘site’, consistent with the intended operation of the provision in the planning scheme.
	Reduce the list of services to be shared to reticulated stormwater, sewer and water where the lot is connected to these services.	The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome. They help to convey that a secondary residence is not intended to be separated from a single dwelling on the same lot and help to clarify the difference between this development and multiple dwellings.
	Amend the definition of gross floor area to explicitly specify which spaces and structures are included and which are excluded for the purposes of calculating gross floor area	According to clause 3.0, Table 3.1 gross floor area means the total floor area of the building measured from the outside of the external walls or the centre of a common wall. This definition is considered sufficient to explain that external spaces such as verandas or courtyards are not included in the calculation.
	Include definitions for ‘appurtenant’ and ‘subordinate’ in the Tasmanian Planning Scheme and provide further clarification on how to assess it.	The ordinary meanings in dictionary definitions for ‘appurtenant’ and ‘subordinate’ are considered suitable for describing the intended interpretation. Appurtenant is commonly used in property law to refer to something attached to or associated with a main property. The word ‘subordinate’ is added to the existing definition that includes the term “appurtenant” to further explain the intent that a secondary residence is an additional subservient home that goes with the main house. These terms are used to convey that a secondary residence is not intended to be separated from a single dwelling on the same lot, and helps to clarify the difference between this development and multiple dwellings. This clause is not intended to be a comparative measure of size between the single dwelling and secondary residence;

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		the size requirement of a secondary residence is given in the definition leading sentence. The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome.
	Not including on-site car parking requirement is anticipated to cause long-term cumulative impacts on the efficiency and safety of our roads Include the requirement for 1 onsite car parking space for a secondary residence in all zones	The approach to parking space numbers reflects the requirements for a dwelling in the General Residential Zone where no more than 2 parking spaces are required per dwelling regardless of how many more bedrooms there are (above two). The single dwelling and secondary residence are intended to share the available on-site parking the same as a larger single dwelling. The choice to have more on-site parking spaces is available to landowners. These parking rates are considered appropriate for large single dwellings in and areas where people depend on cars. There is strong support for the benefits of keeping parking space requirements minimal on sites constrained by existing development where land is limited, to maximise the available land for housing and minimise development costs.
	The inclusion of a secondary residence as a permitted use class in the Agriculture and Rural Zone risks conversion of agricultural land in breach of the State Policy on the Protection of Agricultural Land 2009 as secondary residence may be placed on agriculture land without detailed assessment It is suggested to include a more detailed qualification into the permitted pathway of a secondary residence to ensure that no additional agricultural land will be converted. Alternatively, revise the definition to state that secondary residence must be in the curtilage of the primary dwelling unless there are topographic or natural hazard constraints	The requirements for a secondary residence work together to mean that it is placed close to an existing dwelling and a small additional size. This approach is not expected to cause additional fettering or conversion of agricultural land than would be likely from an existing large single dwelling, services and outbuildings.
	How do you determine the difference between a self-contained entity within a single dwelling and a sperate dwelling within a building if a Secondary Residence can be 'attached to, contained within under the same roofline as the single dwelling?	If the requirements for a secondary dwelling are met it does not matter whether it is located separate, attached or within the same building or roofline as the single dwelling. Otherwise it would be assessed as some other dwelling or non-dwelling

Submission	Summary of Issues Raised	SPO Response
		type.
9-COTA Tasmania	Supports increasing the maximum floor area to 90m², noting it will enable more flexible designs to provide more practical and adaptable housing options. Notes the terms “appurtenant and subordinate” are unlikely to be understood and should be explained in Plain English Accessible and adaptable design - recommend that the amendment be accompanied by practical guidance promoting universal and adaptable design. Develop accessible, plain English guidance on designing secondary residences to support accessibility, care needs, and ageing in place Shared services and meters – mandatory sharing of services including meters may create practical and financial difficulties particularly in rental arrangements. The proposed requirement to share service meters be reconsidered or clarified so that sub-metering and transparent allocation of utility costs are permitted Parking, access, and safety – supports the absence of a mandatory additional parking space, but guidance should be provided to address accessible parking, safe paths of travel and emergency and service access where needed. The Government should establish a monitoring framework from commencement and undertake a publicly reported review of the amendment after two or three years. Security of tenure and protection from financial harm – recommends that the State Government should work with relevant organisations to inform owners and prospective occupants that planning approval grants no ownership rights. Housing affordability and availability - the amendment should not be presented as a complete response to Tasmania’s housing shortage. There is no guarantee that an approved secondary residence will be rented at an affordable price, made available for long-term occupation, built to an accessible standard, or occupied by an older person The reforms should sit within the wider housing strategy with considerations given to incentives for secondary residences that address key housing initiatives including accessible design, affordable rental supply, ageing in place, home-care delivery and protections for older people entering family-	The planning scheme is a legal document and uses defined terms or relies on the common dictionary meaning for interpretation. The planning system does not regulate rental agreements or building design and construction of accessible, universal and adaptable design features. Guidance on these matters is managed by Consumer, Building and Occupational Services Tasmania (CBOS). The draft amendment sits within the government’s wider housing strategy. Other strategic matters raised will be considered, to the extent that they are managed by the planning system, within the broader SPPs Review project for Improving Residential Standards in Tasmania and as part of the government’s recent commitments to provide more housing options for Tasmania, particularly making it easier to develop medium density housing and consult on a new apartment code which will promote and facilitate multi-storey apartments in appropriate locations.

Submission	Summary of Issues Raised	SPO Response
	based housing arrangements	
10-City of Clarence	Increasing the size of secondary residences is unwarranted, as it will promote lower quality housing by discouraging medium density developments, enabling unchecked conversions to visitor accommodation and bypassing relevant residential standards in the planning scheme.	The government's policy is to provide more housing options for Tasmanian's, including enabling more design flexibility through increased allowable floor area for better outcomes when secondary residence options are built through the existing approval pathways in the planning scheme.
	The term 'subordinate' is subjective and unnecessarily complicates clear size-based criteria for secondary residences and creates potential conflict with existing consideration for subservient uses.	Subordinate is added to the existing definition to further explain the intended appurtenant or ancillary relationship between a secondary residence and the main house (single dwelling) that means they are not intended to be separated or considered as separate dwellings. Subordinate is not intended as an additional measure of size that would conflict with the specific gross floor area requirement.
	Suggests updating the definition of single dwelling to specifically include an associated secondary residence, to ensure it is treated as part of the single dwelling use and eliminating the need to amend any use tables or SAPs.	There is no need to change the definition for single dwelling in clause 3.0 Table 3.1, it already means "a dwelling on a lot on which no other dwelling, other than a secondary residence, is situated."
	Treating secondary residence as a separate use requires updating use tables across every zone and SAP, triggering a convoluted multi-step statutory amendment process under LUPAA.	The proposed draft amendments to use tables are simply intended to highlight when the secondary residence subset of Residential Use for a single dwelling is permissible, although the use status of a single dwelling is already clear, and there are no operational issues with assessments. If approved, the change in approach in the SPPs Use Tables means that there may be consequential inconsistencies in the drafting style of LPS Use Tables. The LUPAA provides for review and updating of statutory instruments, including a streamlined LPS amendment pathway for the purpose of removing an inconsistency between the LPS and the SPPs under section 40I(2)(vi) of LUPAA.

Submission	Summary of Issues Raised	SPO Response
		Although not technically necessary to continuing legally correct operation of the provisions, any SAPs, PPZs or SSQs in LPSs that contain a reference to a Use Table qualification for single dwelling, could be brought into greater consistency with the SPPs by adding a qualification for secondary residence through the LPS amendment process.
11- City of Hobart	Support for: - increasing secondary residence maximum gross floor area 90m² - Clarifying that secondary residences should generally have the same use status as a single dwelling - Retaining the principle that secondary residences remain subordinate and share services and access arrangements with the primary dwelling The Draft Amendment warrants refinement or additional guidance to avoid unintended impacts Recommended the following: - 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.	Support noted. Agree monitoring outcomes and appropriate data collection is best practice to inform future strategy and any necessary adjustments to manage any emerging impacts.
	Concern that 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.	These terms are used to convey that a secondary residence is not intended to be separated from a single dwelling on the same lot, and helps to clarify the difference between this development and multiple dwellings. The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome. The revised definition recognises the practical issues with sharing existing services in zones where unserved or off grid locations occur. It continues the current approach to shared access and parking for secondary residences across all zones to ensure that the single dwelling and

Submission	Summary of Issues Raised	SPO Response
		secondary residence are in reasonable proximity, without placing an arbitrary distance requirement between them.
	Recommendation: Provide practical and plain-English guide for the community and practitioners on when a permit is or is not required under the Use Tables. Including: • how “subordinate and appurtenant” is to be interpreted at 90 m², • acceptable servicing arrangements where sewer is not available • “secondary residence vs multiple dwelling” distinctions; • parking expectations and good practice • how proponents should reconcile secondary residence delivery with vegetation retention and hazard management objectives in constrained, vegetated settings • 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	The secondary residence provisions have operated in the SPPs and previous planning schemes with very few issues being raised. Note previous guidance materials about secondary residence or ancillary dwelling have become outdated. If recommended as part of implementing the revised gross floor area and associated clarifications, a new project to produce relevant guidance material could be further considered.
	Cumulative effect - Provide clear practice guidance to design that considers amenity, cumulative effects and consistent interpretation across Councils In inner urban Hobart is that amenity impacts often arise from the cumulative intensity of development on constrained sites Where an approval pathway is “No Permit Required, there is limited ability to manage cumulative site intensity, site servicing and waste management, immediate neighbour impacts consider the cumulative and strategic implications of larger secondary residences within Inner Residential and General Residential zones The SPPs design standards review should incorporate secondary residence draft amendment while establishing pathways for small scale strata housing.	The planning scheme currently manages the intensity of development through appropriate zone application, and assessment against the zone purpose, use and development standards. Generally, the planning scheme is calibrated so that low impact proposals can follow an Exempt or No Permit Required pathway. Where a Discretionary proposal relies on a Performance Criterion, the planning authority can consider whether the overall intensity of the use, including existing development on the land, produces unreasonable impacts on adjoining properties or the locality. Broader zone improvements are being considered through parallel projects for improving residential standards and making it easier to develop medium density housing. Consideration of strata housing is outside the scope of the draft amendment.
	Recommendation - to ensure that the inclusion of secondary residences within 30.4.1A1(b) does not unintentionally constrain well-sited secondary residences.	The draft amendment part 3 clarifies the existing operation of the clause in the Future Urban Zone. Changing the zone operative policy is not considered to be within the scope of the draft amendment

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		according to Terms of Reference.
12-Northern Midlands	No data is provided to support the assumption that an increase in floor area will facilitate smaller household rentals.	Generally, increasing the floor area of a secondary residence can expand housing choice and the supply of housing that is suitable for one or two person households to match the needs of the community. Consequently, more rentals may become available. Further evidence of this outcome requires monitoring and appropriate data collection.
	The statement that Tasmania has one of the smallest limits nationally is misleading. The proposed changes to 90m² would result in Tasmania having one of the largest and least regulated secondary dwelling provisions nationally With smaller lots a larger secondary residence may generate outcomes that feel and operate like dual occupancy without necessarily being assessed.	Within the range of size limits for secondary residences nationally, Tasmania is currently among the smallest. Also other jurisdictions measure gross floor area from inside walls rather than outside walls, meaning less usable floor area is available in Tasmanian developments. The draft amendment continues the existing regulation of these developments through the zone and code requirements for single dwellings in the planning scheme.
	It is misleading that the Terms of Reference refer to the 2023 SPP Review, implying that amendment was an outcome of that process. An increase in floor area of secondary residences was not an action group (AG) item, noting that AG 1.5 relating to secondary residences was to clarify the definition for applications in areas without reticulated water and sewer and off-grid proposals, with no reference to increasing the floor area. Despite further wording changes, still fails to provide clarification of the requirements for secondary residences in un-serviced areas.	The draft amendment responds to the government's commitment to increase the allowable size on of granny flats from 60m² to 90m². It is one part of broader commitments to provide more housing options for Tasmanians and actions supporting the Tasmanian Housing Strategy 2023-2043. The draft amendment also addresses part of SPPs Review action group item AG 1.5 relating to secondary residences for clarifying how the definition is applied in areas without reticulated water and sewer and off-grid proposals. Currently the definition clause (c) may be interpreted that all water, sewerage and electricity connections must be shared between the single dwelling and its secondary residence. The SPPs Review raised that it is often not practical or permissible under the building and plumbing system to share existing connections in unserviced areas. The draft amendment clause (d) clarifies that where a single dwelling is not connected to a metered network then a secondary residence is allowed to be serviced in the same way. It allows for two responses so that existing on-site systems can be shared if design capacity and technology are appropriate, also that new systems can be installed to serve the additional secondary residence independent of existing on-site services. This is comparable to the serving arrangements that may be approved for the additions to a single dwelling such as extra

Submission	Summary of Issues Raised	SPO Response
		bedrooms and bathrooms.
	A secondary residence is not intended to be a rental premises, or to fill a void of smaller dwellings in the market – this is the role of multiple dwellings, where adequate provisions can be put in place to provide for parking, separation of utilities, rubbish disposal and appropriate private open space, therefore maintaining the current community expectations of residential standards of living.	Generally, increasing the floor area of a secondary residence can expand housing choice and the supply of housing that is suitable for one or two person households, shared living arrangements and larger families to match the needs of the community. Consequently, more rentals may become available.
	A floor area of 90 m² exceeds what is reasonably considered “small” or “subordinate,” and therefore does not meet the intended purpose of the secondary residence provisions. A 90 m² floor area is incompatible with the intent of a secondary residence to be a small living unit subordinate to and effectively part of the primary dwelling, having shared use of private open space and parking. It should not substantially increase the demand or intensify the use of these spaces without additional regulation.	Appurtenant is commonly used in property law to refer to something attached to or associated with a main property. The word ‘subordinate’ is added to the existing definition that includes the term “appurtenant” to further explain the intent that a secondary residence is an additional subservient home that goes with the main house. These terms are used to convey that a secondary residence is not intended to be separated from a single dwelling on the same lot, and helps to clarify the difference between this development and multiple dwellings. This clause is not intended to be a comparative measure of size between the single dwelling and secondary residence; the size requirement of a secondary residence is given in the definition leading sentence. The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome. Existing zone development standards for single dwellings apply to manage amenity impacts. Potential planning issues with development of secondary dwellings will continue to be managed in the same way that the impacts of a larger single dwelling are assessed under the relevant zone standards. It is not intended to change the current operation of zone standards for single dwellings which ensure development consistent with the zone purpose, site conditions and character objectives.
	There is likely an expectation that the end user of these secondary residences will expect the same level of amenity/security as a multiple dwelling, but in reality, occupants may have reduced housing security due to reliance on the status/ownership of the main dwelling. This	The explanatory document for the draft amendment explains the government's policy commitments and strategic alignment with the Tasmanian Housing Strategy 2023-2043 and TPPs. This includes providing more housing options to satisfy community needs for well designed one and two

Submission	Summary of Issues Raised	SPO Response
	is contrary to the priorities of the Tasmanian Housing Strategy 2023-2043.	bedroom dwellings, shared living arrangements, flexibility for families at different life stages, and aging in place. All of the functions on a lot for a single dwelling and secondary residence are expected to be shared. The distinctions in the planning scheme between multiple dwellings and a single dwelling with secondary residence remain the same. Home ownership and rental arrangements are regulated outside the planning system.
	Increasing the floor area of ancillary/secondary residences does not achieve the 'Missing Middle' styles of housing identified in the Tasmanian Housing Strategy 2023-2043 and there is no requirement for accessible features and proximity to services, transport and social networks.	The draft amendment will continue to allow the potential for a secondary residence to be built wherever a single dwelling can be built as the planning scheme currently operates.
	If a 90m² maximum floor area is established, the secondary residence has the potential to be larger than the existing dwelling. The provisions are not clear that the existing dwelling may require a change of use to become a secondary dwelling, if this is the case.	There are various scenarios for building a secondary residence with a single dwelling depending on if there is an existing dwelling and its size. The definition of a secondary dwelling must still be met by one of the residences for the overall development of the lot to be assessed as a single dwelling with secondary residence. It is possible that an existing small house is reclassified as a secondary residence if a larger dwelling can be built and the initial dwelling meets the secondary residence definition. If two dwellings are proposed on a lot and neither of them meets the secondary residence definition, then they will need to be assessed against the multiple dwellings requirements.
	A 90m² floor area easily accommodates a 3-bedroom home, with the ability to generate the same number of vehicle movements, parking requirements, stormwater, sewerage and waste, as the main dwelling, with no upgrade to supporting infrastructure required.	Potential planning issues with development of secondary dwellings will continue to be managed in the same way that the impacts of a larger single dwelling are assessed under the relevant zone standards. Secondary residences remain modest in scale consistent with what can be developed as a single dwelling on a lot. Operational impacts are expected to be manageable.
	Increasing the floor area of secondary residences to a 90m²/3-bedroom home could also incentivise them being used for short-stay accommodation (as they would likely meet exemption 4.1.6), thus undermining the stated housing objectives.	There are separate regulations in the planning scheme for managing impacts of various scales of use and development for Visitor Accommodation.

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	The lack of infrastructure installed at the time of construction will make any future strata difficult and create a regulatory burden for Councils.	Secondary residences are not intended for separate ownership from a single dwelling. The single dwelling and secondary residence provisions are not intended to provide for strata division.
13-West Tamar	Point 1 - It is possible that some 90m2 secondary residences may be larger than the original dwelling. Suggests there should be a provision that require that the larger building to be the primary residence. Need guidance on what components of a secondary residence make it appurtenant and subordinate to a single dwelling.	Appurtenant is commonly used in property law to refer to something attached to or associated with a main property. The word 'subordinate' is added to the existing definition that includes the term "appurtenant" to further explain the intent that a secondary residence is an additional subservient home that goes with the main house. These terms are used to convey that a secondary residence is not intended to be separated from a single dwelling on the same lot, and helps to clarify the difference between this development and multiple dwellings. This clause is not intended to be a comparative measure of size between the single dwelling and secondary residence; the size requirement of a secondary residence is given in the definition leading sentence. The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome. The definition of a secondary dwelling must still be met by one of the residences for the overall development of the lot to be assessed as a single dwelling with secondary residence. It is possible that an existing small house is reclassified as a secondary residence if a larger dwelling can be built and the initial dwelling meets the secondary residence definition. If two dwellings are proposed on a lot and neither of them meets the secondary residence definition, then they will need to be assessed against the multiple dwellings requirements.
	Point 2-10 and 12-13 – does not support the proposed changes to insert 'secondary dwelling' separate to single dwelling, as it seems to distinguish a secondary residence as a separate use to single dwelling. The changes proposed in point 5 are unnecessary as the restriction cannot be separately restricted under section 71 of the Act.	The proposed draft amendments to use tables highlight when the secondary residence subset of Residential Use for a single dwelling is permissible. It is accepted that the use status of a single dwelling is already technically clear through various definitions, and there are no technical operational issues with assessments. The draft amendments are intended to clarify and promote to users of the planning scheme when a secondary residence is able to be built with a single dwelling without needing to interpret multiple parts of the planning scheme. This change is

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		comparable to the way a home-based business use is separately listed in use tables but is linked to the existence of a dwelling by its definition. The changes in zone and code standards are proposed for consistency of approach wherever a single dwelling is specifically listed in the planning scheme.
	Point 1 and Point 11 – parking requirements should be included for secondary residences as an increase to 90m² would generate additional parking demand. Suggests “parking” be removed from Definition clause (c), noting that it is reasonable for a secondary residence to have its own parking The wording of part C regarding parking is ambiguous and inconsistent with the explanation provided in part 4, as the allowance for additional parking in Part 4 does not resolve the apparent restriction implied by part C.	The requirement in the definition that the secondary residence shares the vehicular access, driveway and parking with single dwelling works with other parts of the definition to make it clear that a single dwelling and secondary residence are not intended to be separated. The single dwelling and secondary residence are intended to share the available on-site parking the same as a larger single dwelling. The approach to parking space numbers under the Parking and Sustainable Transport Code reflects the requirements for a dwelling in the General Residential Zone where no more than 2 parking spaces are required per dwelling regardless of how many more bedrooms there are (above two). These parking rates are considered appropriate for large single dwellings, and in areas where people depend on cars. he choice to have more on-site parking spaces is available to landowners. The Parking and Sustainable Code allows for assessment of additional parking to support a single dwelling and secondary.
	Additional private open space for secondary residences should be required where the secondary residences greater than 60m².	The intention is that all of the amenity and facilities of the site are shared between a single dwelling and secondary residence.
	Secondary residences of 90m² is likely to add to the operational requirements of councils including road and rubbish	Potential planning issues with development of secondary dwellings will continue to be managed in the same way that the impacts of a larger single dwelling are assessed under the relevant zone standards. Secondary residences remain modest in scale consistent with what can be developed as a single dwelling on a lot. Operational impacts are expected to be manageable.
	The requirement under AS/NZS 4819:2011 for secondary residences to have a separate address undermines the purpose	Agree the single dwelling and secondary residence are not intended to be separately owned and should remain under one

Submission	Summary of Issues Raised	SPO Response
	of a secondar residence as subservient to the main dwelling. Suggests include a requirement that there should not be separate address for secondary residence and a main building	address, it is understood that only new subdivision or multiple dwellings would require separate addresses. Resolving address issues is not within the scope of the amendment. Matters of address are not appropriate planning scheme considerations and are separately regulated. Resolution to address issues should be pursued through the relevant Australian standard.
14-Flinders Council	The proposed changes do not reflect the operational issues that planning authorities deal with Criteria A - Lack of data to support the proposed amendment Criteria B – the term ‘appurtenant’ is unclear and confusing and must be defined Criteria D - Councils have no role in regulating requirements for shared gas and electricity connections and meters with the main house.	The word ‘subordinate’ is added to the existing definition that includes the term “appurtenant” to further explain the intent that a secondary residence is an additional subservient home that goes with the main house. These terms are used to convey that a secondary residence is not intended to be separated from a single dwelling on the same lot, and helps to clarify the difference between this development and multiple dwellings. This clause is not intended to be a comparative measure of size between the single dwelling and secondary residence; the size requirement of a secondary residence is given in the definition leading sentence. The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome. The ordinary dictionary meaning of the terms is considered sufficient for understanding the intent of the provision without a creating a particular planning definition.
	References in use tables and development standards are, by definition, redundant.	The proposed draft amendments to use tables highlight when the secondary residence subset of Residential Use for a single dwelling is permissible. It is accepted that the use status of a single dwelling is already technically clear through various definitions, and there are no technical operational issues with assessments. The draft amendments are intended to clarify and promote to users of the planning scheme when a secondary residence is able to be built with a single dwelling without needing to interpret multiple parts of the planning scheme. This change is comparable to the way a home-based business use is separately listed in use tables but is linked to the existence of a dwelling by its definition. The changes in zone and code standards are proposed for consistency of approach wherever a single dwelling is specifically

Submission	Summary of Issues Raised	SPO Response
		listed in the planning scheme.
	Car parking is required for secondary dwellings greater than 60m ²	The approach to parking space numbers reflects the requirements for a dwelling in the General Residential Zone. These parking rates are considered appropriate for large single dwellings, and in areas where people depend on cars. The single dwelling and secondary residence are intended to share the available on-site parking the same as a larger single dwelling.
	Strata subdivision of secondary dwellings requires a clear prohibition under the Scheme. The exemption at 4.6.18 must be revised to specifically prohibit application to secondary dwellings. The proposed changes are likely to increase the demands by owners for strata or freehold subdivision, better economic returns and complaints that Council just being a blockage to housing.	Secondary residences are not intended for separate ownership from a single dwelling. The single dwelling and secondary residence provisions are not intended to provide for strata division, particularly with services required to be shared. The draft amendment does not alter any operation between the planning, building, and strata titling systems currently in place. A single dwelling with secondary residence on a lot is distinct from 2 multiple dwellings on a lot. Multiple dwellings have separate use and development requirements under the planning scheme and separate connections to services which enable them to be strata titled. To separate a secondary residence from the single dwelling would normally require that all of the requirements for use and development of multiple dwellings on the lot can be met, as well as all building requirements and approvals prior to requesting approval of strata division under the Strata Titles Act 1998. The scope of the draft amendment in the Terms of Reference does not provide for consideration of broader issues such as strata titles.
	More substantial dwellings can be established through this process that will impact both the subject and surrounding sites.	Potential planning issues with development of secondary dwellings will continue to be managed in the same way that the impacts of a larger single dwelling are assessed under the relevant zone standards. It is not intended to change the current operation of zone standards for single dwellings which ensure development consistent with the zone purpose, site conditions and character objectives.
	The proposed amendment is an ad-hoc political response that fails to address the larger issues with housing availability and affordability	The draft amendment responds to the government's commitment to increase the allowable size on of granny flats from 60m ² to 90m ² . It is one part of broader commitments to provide more housing

Submission	Summary of Issues Raised	SPO Response
		options for Tasmanians and actions supporting the Tasmanian Housing Strategy 2023-2043.
15-PIA Tasmania	Concerned that increased infill development will result in the sterilisation of land for more considered residential development that better suits the needs of the community.	The draft amendment responds to the government's commitment to increase the allowable size on of granny flats from 60m² to 90m². It is one part of broader commitments to provide more housing options for Tasmanians and actions supporting the Tasmanian Housing Strategy 2023-2043. It is consistent with relevant strategies 1.1.3, 1.2.3 and 1.5.3 of the Tasmanian Planning Policies as detailed in the Explanatory Document for the draft amendment.
	The proposed reforms are likely to frustrate existing and future data collection as more housing is included under the definition of a 'single dwelling'.	Agree monitoring outcomes and appropriate data collection is best practice to inform future strategy and any necessary adjustments to manage any emerging impacts. Data collection about single dwellings may need to be more detailed.
	The terminology "secondary residence" be used consistently throughout consultation material and the planning framework in preference to the colloquial term "granny flat".	The term granny flat is not used in the planning scheme and is not proposed as part of the draft amendment.
	References to secondary residences in the use table and codes, as proposed, are redundant and should be refused, with further redundant references to secondary residence removed in zone and code standards	The proposed draft amendments to use tables highlight when the secondary residence subset of Residential Use for a single dwelling is permissible. It is accepted that the use status of a single dwelling is already technically clear through various definitions, and there are no technical operational issues with assessments. The draft amendments are intended to clarify and promote to users of the planning scheme when a secondary residence is able to be built with a single dwelling without needing to interpret multiple parts of the planning scheme. This change is comparable to the way a home-based business use is separately listed in use tables but is linked to the existence of a dwelling by its definition. The changes in zone and code standards are proposed for consistency of approach wherever a single dwelling is specifically listed in the planning scheme.
	Better development standards in the residential zones to require clearer consideration of access to sunlight, overshadowing and deep planting zone requirements for secondary residences (and all) dwellings.	Potential planning issues with development of secondary dwellings will continue to be managed in the same way that the impacts of a larger single dwelling are assessed under the relevant zone standards. This amendment is not intended to change

Submission	Summary of Issues Raised	SPO Response
		the current operation of zone standards for single dwellings which ensure development consistent with the zone purpose, site conditions and character objectives. A separate broader review of residential standards in the planning scheme is currently underway.
	A more nuanced approach to on-site car parking requirements is required that is more realistically based on access to transport options and/or the total number of bedrooms (or rooms capable of being used as bedrooms) on the site.	The approach to parking space numbers reflects the requirements for a dwelling in the General Residential Zone. These parking rates are considered appropriate for large single dwellings, and in areas where people depend on cars. The single dwelling and secondary residence are intended to share the available on-site parking the same as a larger single dwelling.
	Given the nature and scale of the proposed changes, clause 4.6.18 should be revised to specifically remove the potential strata division for secondary residences.	Secondary residences are not intended for separate ownership from a single dwelling. The single dwelling and secondary residence provisions are not intended to provide for strata division, particularly with services required to be shared. The draft amendment does not alter any operation between the planning, building, and strata titling systems currently in place. A single dwelling with secondary residence on a lot is distinct from 2 multiple dwellings on a lot. Multiple dwellings have separate use and development requirements under the planning scheme. To separate a secondary residence from the single dwelling would normally require that all of the requirements for use and development of multiple dwellings on the lot can be met, as well as all building requirements and approvals prior to requesting approval of strata division under the Strata Titles Act 1998. The scope of the draft amendment in the Terms of Reference does not provide for consideration of broader issues such as strata titles.
	Note the Terms of Reference identify a review of the State Planning Provisions was completed in 2023 but no final report or statement of outcomes and commitments was released or published	The first SPPs Review was completed in 2023 with publication of a final report responding to issues raised and outlining the resulting work program. The SPPs Review work program implementation is ongoing. More information and the SPPs Review Consultation Report June 2023 is available on the Planning in Tasmania website https://www.stateplanning.tas.gov.au/.

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	There are no provisions within the SPPs for key amenity aspects for secondary residences, hence it is not clear how the proposed change will achieve TPP strategy 1.5.3 (4) b) and c), contrary to the claims in the explanatory document	Secondary residence is assessed under the zone requirements for single dwellings. The expectation is that all aspects of the lot's amenity will be shared between the main and secondary residences.
	Definition - Given the definition for single dwelling includes secondary residence, suggest to either use the term here 'existing dwelling'. Or alternatively rewrite the sentence, 'means an additional self-contained residence that is part of a single dwelling.	It is not clear what issue is sought to be remedied. The definitions and cross referenced terms are considered to operate with clarity as intended. No change to draft SPP amendment 01-2026 is recommended.
	Appurtenant - The explanations provided for the concepts of appurtenant and subordinate, are readily understood within residential urban serviced area. The terminology is less helpful in unserviced areas, larger lot and non -residential zoned land. The lack of clarity around the distance separating the main and secondary residences, and the ability to be provided with individual sewerage and water infrastructure, by removing the requirement to share services, in the proposed definition of secondary residence are considered problematic in zones where larger lots are the norm, such as Rural Living Zone, Rural Zone, Agriculture Zone and Landscape Conservation Zone. In the non-residential zones, this is likely to increase the conversion of agricultural land for non-agricultural uses, noting that what is considered 'appurtenant' or being 'in proximity to each other' becomes subjective on larger lots.	The requirements in clauses (a) to (d) in the secondary residence definition are meant to work together to support the intended outcome. These requirements together mean that a secondary residence is placed close to an existing dwelling and a small additional size. This approach is not expected to cause additional fettering or conversion of agricultural land than would be likely from an existing large single dwelling, services and outbuildings. The revised definition recognises the practical issues with sharing existing services in zones where unserviced or off grid locations occur. It continues the current approach to shared access and parking for secondary residences across all zones to ensure that the single dwelling and secondary residence are in reasonable proximity, without placing an arbitrary distance requirement between them.
	Strategic concerns the proposed changes maintain the status quo of historic dwelling forms, creating default single storey, multiple-dwelling type developments with extensive impervious surfaces. The proposal to allow the secondary residence to be larger than an existing dwelling that is less than 90m2 is likely to compromise the potential for medium density developments. It provides no incentive for builders/developers to move into consolidating lots or providing medium density built forms, as per the state government Medium Density Design Guidelines 2025. The strategic work to identify where	The proposed amendment is a small part of the government's broader housing strategies as outlined above. The government's policy is to provide more housing options for Tasmanian's, including enabling more design flexibility through increased allowable floor area for better outcomes when secondary residence options are built through the existing approval pathways in the planning scheme.

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	increased density is desirable within Local Government Areas, has not been fully completed to inform the intent of the amendment.	
16-Tasman Council	Supports the proposed amendments to increase the maximum gross floor area of secondary residences to 90m² and associated amendments that clarify the planning treatment of secondary residences. The current 60 square metre limitation can unnecessarily constrain the functionality and usability of secondary residences. Considers the proposed amendment to be a practical, proportionate and forward-looking response to the housing challenges currently facing Tasmania	Support noted.
17-South Hobart Sustainable Community	Ambiguous Terminology – Defining a secondary residence both as part of a single dwelling and as a separate structure to a single dwelling creates confusion, using primary residence under the umbrella term single dwelling provides much clearer distinction. Clarification is required on whether dwelling and single dwelling mean different things in item No.4, if not, the wording should be revised to ensure consistency with the preferred terms.	The proposed terminology in the draft amendment is used to fit with other definitions in the planning scheme and its operation more broadly. The terms ‘dwelling’ and ‘single dwelling’ are defined in the planning scheme, they are intended to convey different meanings in item 4 of the draft amendment, as well as continuing the current operation of the provisions. No change to draft SPP amendment 01-2026 is recommended.
	Support the increase to the GFA to 90m ² in principle noting the benefits including flexibility to increase urban and suburban density while utilising existing infrastructure	Support noted.
	Note the proposed increase may create the following challenges: • 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 • Secondary dwellings may readily qualify as permit-free ‘short-term accommodation’ under the home-sharing rule of a maximum of 4 bedrooms which may undermine the efforts to increase	Potential planning issues with development of secondary dwellings will continue to be managed in the same way that the impacts of a larger single dwelling are assessed under the relevant zone standards. It is accepted that the opportunity for a 90m² secondary residence may not be able to be fully realised in all circumstances. It is not intended to change the current operation of zone standards for single dwellings which ensure development consistent with the zone purpose, site conditions and character objectives. Building design, classification and construction matters are managed through the building system and NCC. No change to draft SPP amendment 01-2026 is recommended.

Submission	Summary of Issues Raised	SPO Response
	the availability of long-term accommodation • Local infrastructure could become strained due to incremental additional demand of older utilities • Due to siting of these structures, a higher proportion of these secondary residences won't be able to gravity feed to stormwater or sewer • 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	