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**From:** Danielle Gray [REDACTED]  
**Sent:** Thursday, 8 October 2026 5:23 PM  
**To:** TPC Enquiry  
**Cc:** Ken Thomason; Kelly, Odin  
**Subject:** Representor correspondence Regarding State Planning Provisions - draft amendment 01-2026 - Secondary Residences  
**Attachments:** State Planning Provisions - draft amendment 01-2026- letter to representors, 28 September 2026.PDF; State Planning Provisions - draft amendment 01-2026 - Submission - State Planning Office, 24 September 2026.PDF; Representor letter 07.10.2026 Gray Planning for Thomason.pdf

**RE: State Planning Provisions - draft amendment 01-2026 - Secondary Residences  
Representor correspondence regarding further submission outlining amendments to SPP  
Secondary Residences**

Dear Mr Ramsay AM,

I make reference to the attached correspondence dated 28 September 2026 and accordingly attach a letter responding to the SPO's submission dated 24 September 2026, on behalf of representor Mr Ken Thomason.

Please get in touch if you wish to discuss,

Regards  
Danielle

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7 October 2026

Mr John Ramsay AM and Ms Claire Hynes  
Tasmanian Planning Commission  
Level 3, 144 Macquarie Street  
Hobart TAS 7001  
Via email: [tpc@planning.tas.gov.au](mailto:tpc@planning.tas.gov.au)

Dear Mr Ramsay and Ms Hynes,

**RE: State Planning Provisions Draft amendment 01-2026 Secondary Residence**

I refer to the Commission's correspondence dated 28 September 2026 and the enclosed correspondence from Mr McPhail of the State Planning Office, Building Tasmania regarding further clarification for the amendment of the definition of a Secondary residence in the State Planning Provisions.

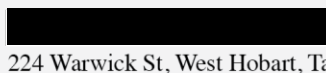
Gray Planning has been engaged by Mr Ken Thomason to provide town planning assistance in these proceedings regarding the proposed amendment to the State Planning Provisions for the definition and requirements of a 'Secondary Residence'.

Having reviewed the correspondence from the State Planning Office dated 24 September 2026, I wish to advise on behalf of Mr Thomason that I do not object to any of the proposed updates to the definition of 'Secondary Residence' other than to provide support for the inclusion of the word 'subordinate' as previously proposed by the SPO.

The word 'appurtenant' has been used with respect to secondary residence/ancillary dwellings/granny flats for at least the last 10 years in Tasmanian Planning Schemes (Interim Planning Schemes and now the State Planning Provisions) and I am not aware where this word or its meaning has caused difficulty or significant disagreement in reasonably interpreting its intention. Likewise, I am not aware of any appeals before RMPAT and now TASCAT where the interpretation of this word has been an appeal matter debated.

On that basis, I find the inclusion of the word 'subordinate' to be likewise easily able to be interpreted in the context of undertaking assessments for secondary residences.

Typically, where a word is not defined in the Planning Scheme itself (in this case the State Planning Provisions) it is standard practice to refer to the Macquarie Dictionary (or similar



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reputable dictionary) to obtain a definition where there is any confusion or disagreement on the interpretation of, and therefore intention of a word.

The word 'subordinate' clearly means: 'less in power, of lower or less importance or dependent on another'.

It is my view that this word will provide further clarification of, and understanding of the definition and intent of a secondary residence and its required characteristics. It is my view that this is important where the floor area is being increased to enable secondary residences up to 90sqm to be constructed alongside an existing single dwelling.

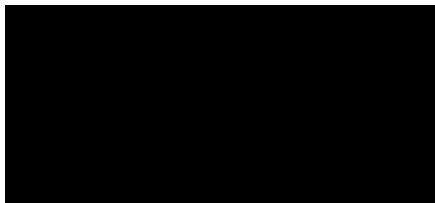
'Appurtenant' gives the assessor an understanding of appropriate placement for a Secondary Residence in association with a Single Dwelling while the inclusion of the word 'subordinate' provides additional guidance for the placement, scale, presence and relationship of the proposed Secondary Residence in association with a Single Dwelling.

It is therefore my view that the word 'subordinate' should be retained alongside the word 'appurtenant' as part of the definition of a Secondary Residence.

All other amendments proposed by the SPO in their correspondence dated 24 September 2026 are supported in full.

Should you wish to discuss the above, I may be contacted on [REDACTED].

Yours faithfully



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