

12.3.3 b) Submission - Local Planning Policy 20

Richard Hindley

From: Simon Burnell <simon.r.burnell@gmail.com>
Sent: Friday, 26 June 2026 9:57 AM
To: Richard Hindley
Subject: Draft LPP 20 Unhosted Short Term Rental Accommodation

Follow Up Flag: Flag for follow up
Flag Status: Flagged

You don't often get email from simon.r.burnell@gmail.com. [Learn why this is important](#)

Hi

The following provides comment on draft LPP 20 currently out for advertising:

2.1 / 2.2 Bushfire and development in BAL 40 and FZ - I believe the intent for these two parts is to clarify that the actual holiday home itself should be located outside of areas identified as BAL 40 and FZ. Given the policy primarily deals with land use relevant to a lot, and these parts of the policy are not specific to either the lot or the dwelling (refers to development generally), this could cause some confusion or concern for landowners looking to apply or extend for STRA.

A possible suggestion would be to update 2.2 to be more specific to the dwelling.

Given that a level of bushfire risk is applicable to most lots in Bremer Bay and that a considerable amount would have BAL 40 / FZ somewhere on the lot, the positioning of the dwelling away from the risk in BAL 29 or lower or an APZ (as applicable) should be the intent, consistent with the principles of SPP 3.7. Often the bushfire risk to a lot is from unmanaged public land, therefore a blanket approach of BAL 40 / FZ applicable to a lot would not be a suitable approach to STRA, and is inconsistent with the intent of SPP 3.7. I don't believe this level of limitation is the intent of the draft policy, but just wanted to clarify.

Thanks,

Simon Burnell
38 Bremer Bay Road.