

Destination Management Plan for Noosa Shire

Submission by Noosa Chamber of Commerce and Industry

Noosa Chamber submits that global uncertainty, the growing South East Queensland population, Noosa Council's commitments on behalf of the Noosa Shire people, and the state of Noosa's economy require that the Destination Management Plan take into consideration Noosa Shire's economic sustainability.

To address this, Noosa Chamber recommends the addition of a 'Balanced Community Adaptation Scenario', to be implemented in tandem with any ultimately selected actions from the Discussion Paper's Steady-State/Current, Aspirational and/or Transformational scenarios.

Balanced Community Adaptation Scenario – Desired community supported improvements and actions that ensure the sustainable growth of Noosa Shire's resident and visitor populations and economy.

In relation to the specific opportunities and issues in the Discussion Paper, Noosa Chamber proposes additional actions in line with a 'Balanced Community Adaption Scenario'.

Noosa Chamber does not support the 'Do Nothing Scenario' nor a few particular actions currently listed under the Aspirational and Transformational Scenarios. These are specified in this submission.

Some discrepancies and errors in the Discussion Paper are addressed in the separate Appendix.

Global and Local Context

Potential future global issues include sea level rises, storm surges, more frequent and extreme weather events, more frequent global pandemics, and inundation of low-lying island nations. These may lead to growing global civil unrest and wars, and increased migration to safe havens from war torn or inundated island countries and, domestically, from flood-prone and bushfire-prone localities.

These impacts may lead to ongoing uncertainty, including economic uncertainty. The State Government and Noosa Council are already planning coastal hazard adaptation based on 2040, 2070 and 2100 forecast sea level rises.

For Noosa as a tourist destination, global threats and high fuel prices may see Australians preferring domestic travel and the arrival of fewer overseas visitors. Given this and the forecast South East Queensland population increases, Noosa Council needs to plan for more domestic visitors.

Tourism is a major economic driver in Noosa Shire and has a ripple effect (flow on effect) throughout the Noosa economy. Any policies or actions detrimental to Noosa's small businesses could undermine Noosa's ability to remain an independent local council area.

Noosa Chamber submits that the Destination Management Plan needs to take account of global impacts, uncertainty and business impacts to ensure Noosa's ongoing economic sustainability.

The Noosa Biosphere Reserve

In 2007 UNESCO recognised Noosa Shire as a Biosphere Reserve. UNESCO's Strategic Objective 2 is:

“Contribute to building sustainable, healthy and equitable societies, economies and thriving human settlements in harmony with the biosphere.”

Noosa Chamber submits that to honour UNESCO's intended balanced approach to community, economy and environment, actions in the Destination Management Plan should contribute to a sustainable economy as well as social and environmental considerations.

Small Business Friendly Council Charter

Noosa Chamber notes that the majority of businesses in Noosa Shire are small resident-owned businesses. The April 2023 report to Council stated:

“Noosa Shire is home to just over 7,000 GST registered businesses of which 58% are non-employing, 31% have 1-4 employees and 9.2% have between 5-19 employees.”

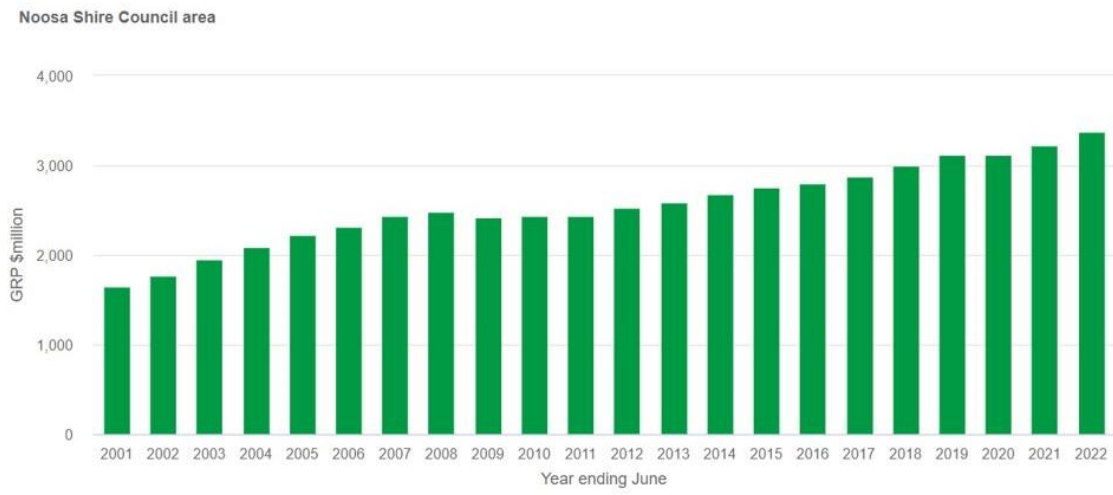
In April 2023 Noosa Council approved joining the State Government's Small Business Friendly Councils Program by signing the Small Business Friendly Charter, which includes:

- “The Small Business Friendly (SBF) Program brings people together around a common goal to enhance the operating environment for small businesses and provide the opportunities they need to thrive.”
- “Actively engage and be mindful of small businesses, their issues and priorities when making decisions.”
- “Publicly recognise and value the importance of small businesses to our community and local economy.”
- “Encourage and promote small business engagement via marketing and communication channels.”
- “Monitor our performance against this charter and ensure we are meeting our commitments.”

The Noosa Chamber submits that the Destination Management Plan needs to reflect Council's commitment to the Small Business Friendly Charter and Noosa residents' small businesses.

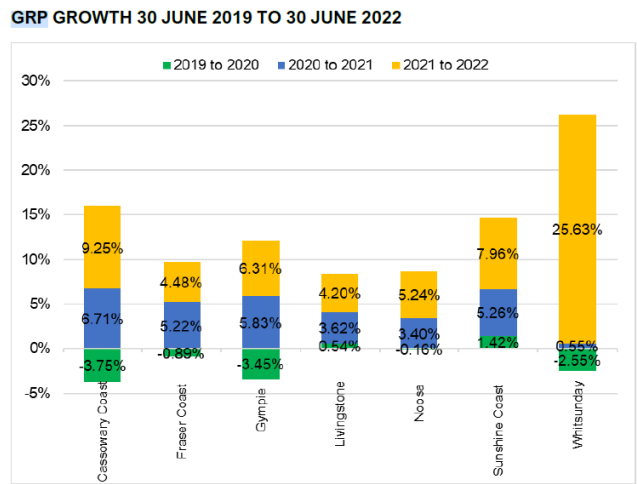
Noosa Shire's Economic Status

NEIR data collated by Economy ID shows that Noosa's gross regional product (GRP) has seen no significant growth over the past 10 years and hence is not keeping pace with inflation and the cost of living in real terms. For the sake of residents, it is imperative that the Destination Management Plan ensure no economic shocks to local small businesses.



Source: National Institute of Economic and Industry Research (NIEIR) ©2022. ©2023. Compiled and presented in economy.id by .id (informed decisions).

Furthermore data sourced from Economy ID shows Noosa’s GRP growth from 2019 to 2022 has been low compared with other like LGAs.



Data Source: economy.id

Commentary:
 Headline Gross Regional Product or GRP is a measure of size or net wealth generated by the local economy. Noosa Shire had the second lowest GRP growth since 30 June 2019.

The Noosa Chamber submits that the Destination Management Plan should ensure no detrimental economic impacts of its recommendations.

Discussion Paper Opportunities and Issues Section

In relation to the specific opportunities and issues in the Discussion Paper, Noosa Chamber proposes the following additional actions in line with a ‘Balanced Community Adaption Scenario’.

Noosa Chamber does not support the ‘Do Nothing Scenario’ nor a few particular actions currently listed under the Aspirational and Transformational Scenarios, as specified below.

Traffic Management

Given the widely spread out nature of Noosa Shire villages and the likelihood of increased domestic visitation from Brisbane and South East Queensland, car travel will continue to be a necessity. This needs to be planned for.

For traffic management, Noosa Chamber recommends these additional future actions:

- Facilitate additional and improved park and ride sites at transit hubs on incoming/outgoing transport corridors with frequent bus services.
- Facilitate construction of barely visible multilevel parking stations along transport corridors instead of sprawling tarmac car parks detrimental to the environment and visual amenity.
- Facilitate and activate a transit centre at the Noosa Business Centre, as per the Noosa Plan.
- Improve road network design to facilitate safe and efficient movement along main thoroughfares with linkages to park and ride sites and public transport to popular destinations.

Environment

Noosa Chamber recommends this additional action:

- Proactively implement the Noosa Biosphere Reserve as intended by UNESCO's Man and the Biosphere Program which values an integrated balanced approach to community, economy and environment as described in UNESCO's Strategic Objective 2: *"Contribute to building sustainable, healthy and equitable societies, economies and thriving human settlements in harmony with the biosphere."*

Waste Management

Noosa Chamber supports Noosa Council's examples of waste management actions and suggests these should be integrated into Council's mainstream Waste Management program as they are not specific only to destination management.

Destination Marketing

Noosa Chamber does not support the future action "Focus only on marketing tourism businesses that align with shared community values", as this is too limiting given the diverse nature of tourism businesses and consumer needs and does not reflect the inclusive Small Business Friendly Charter.

Visitor Accommodation

Noosa Chamber recommends adding:

- Support development in tourist accommodation zones in recognition of Noosa as a desirable destination and to reduce demand for STAs in residential zones.
- Encourage and support development of five star tourist accommodation in line with the 'value over volume' policy, to meet the demands of the 5 star tourism sector, and to reduce demand for STAs in high value residential areas.
- Exempt tourist resort unit owners from the Short Stay Letting and Home Hosted Accommodation Local Law to incentivise owners to not permanently let resort units.
- Support development of affordable housing for workers, taking innovative action such as Moreton Bay Council releasing public land to community housing and homelessness providers for the purpose of social, affordable, and crisis housing.

- Amend the Noosa Plan to allow relevant worker accommodation in industrial zones.
- Implement an Adopt a Worker rental program as already devised by Noosa Council with Noosa Chamber, with participating homeowners exempted from paying fees under the Short Stay Letting and Home Hosted Accommodation Local Law.

Visitor Experiences and Services

Noosa Chamber supports Noosa Council’s visitor experiences and services suggestions in general.

However the possible future action “Develop a carrying capacity model to determine best use of tourism infrastructure, experiences and services” is not sufficiently defined to allow for informed comment. Noosa Chamber cannot support this inexact statement which has the potential to be detrimental to Noosa’s small businesses.

Also, Noosa Chamber notes that many tourists simply come to Noosa to enjoy the accommodation, restaurants, shopping and relaxation. These leisure activities are not represented or quantified as meaningful visitor experiences and services in the discussion paper and yet have little impact on Noosa’s environment and infrastructure.

Iconic Events

Noosa Chamber recommends this additional future action:

- Ensure benefits for businesses are maximised and impacts on businesses are minimised by events.

Governance

Noosa Chamber notes that the Aspirational and Transformational scenarios under Governance envision major interventions into the free market and Noosa economy. Noosa Chambers believes such interventions are likely to be regressive and dysfunctional to Noosa businesses and the Noosa economy, which could damage Noosa Shire’s sustainability as a standalone local government area and are in conflict with the Small Business Friendly Charter.

In relation to governance in general, Noosa Chamber suggests these possible additional future actions:

- Plan and implement proactive adaptation to future circumstances.
- Demonstrate courageous leadership, educating and helping the community accept and prepare for change.

APPENDIX: Discrepancies and Errors in Discussion Paper

This section notes some discrepancies and errors in the Destination Management Plan Discussion Paper.

Page 3 **“COVID-19 [...] There was also an increase in the drive market day-tripper who did not want to plan a multi-day break due to lockdown concerns.”**

No evidence or source provided.

Page 4 **“the residents and community are an underpinning influence that make the Shire so attractive to visitors from around the world.”**

No evidence or source provided.

Page 4 **“Noosa Council responded by placing greater focus on protecting the natural environment through a more constrained planning framework, and the introduction of a resident carrying capacity and development restrictions to guide future service levels and amenity needs in the region”**

It is true that Noosa Council advocated vis-à-vis the State Government to not expand the urban footprint and introduced development restrictions. However, the ‘population cap’ was a merely a slogan. There has never been a population cap or an agreed “resident carrying capacity”.

Page 5 **“The Value of Tourism to the Noosa Community Survey Report 2019 provided some insight into the residents’ views on tourism. Most respondents indicated tourism as being good for the community and economy; however over 84% also agreed it can disrupt the lives of residents in relation to traffic, parking and restricted access to public facilities.”**

In the Executive Summary of the Value of Tourism Report, there is a statement referring to 84%, but this may be an error.

Appendix 6, which contains the survey results, shows

- 54% agreed with the statement that “Tourism can sometimes disrupt the lives of local residents and add to problems like traffic congestion, parking difficulties and excessive noise”
- 53% agreed with the statement “Tourists, at busy times, can restrict local residents access to public facilities, such as roads, parks, sporting facilities and public transport”

In contrast, 84% agreed with the statement “The increase in property values, due to Noosa’s appeal, makes it more difficult for some people to live in the area”

It is noted that the set of statements in the survey were a ‘forced choice’, limiting respondents’ answers.

It is also noted that the sample size of 300 residents likely led to significant margins of error and a lower than acceptable confidence level. Professional researchers indicate a sample size of 382 for a population between 50,000 to 75,000. It is a concern that the ‘Value of Tourism to the Noosa Community Survey Report’ only quotes Survey Monkey as its source of expertise about sample size.

Page 5 Top 5 Community Values

- **Elements of natural environment 77%**
- **Protection of the natural environment 66%**
- **Condition of public open space 58%**
- **Landscaping of Public Open Space 51%**
- **Neighbourhood safety 51%**

The actual 2021 Liveability Survey report shows some of these figures are incorrect. Referencing only the top 5 diminishes the important value of the other items which are quite diverse. It is also noted that this was a forced choice questionnaire. Only those values listed could be ticked.

Elements of natural environment (natural features, views, vegetation, topography, water, wildlife etc.)	77%
Protection of the natural environment	66%
General condition of public open space (street trees, footpaths, parks etc.)	58%
Sense of neighbourhood safety (from crime, traffic, pollution etc.)	55%
Landscaping and natural elements (street trees, planting, water features etc.)	51%
Walking/jogging/bike paths that connect housing to communal amenity (shops, parks etc.)	51%
Sense of personal safety (for all ages, genders, day or night)	49%
Local businesses that provide for daily needs (grocery stores, pharmacy, banks etc.)	48%
Access to neighbourhood amenities (cafes, shops, health and wellness services etc.)	48%
Access and safety of walking, cycling and/or public transport (signage, paths, lighting etc.)	48%
Locally owned and operated businesses	46%
Sense of belonging in the community	45%
Quality of public space (footpaths, verges, parks etc.)	41%
Overall visual character of the neighbourhood	40%
Spaces suitable for specific activities or special interests (entertainment, exercise, dog park, BBQs etc.)	40%

Page 7 **“In 2022, 955,000 domestic day trippers spent \$103 million in Noosa Shire compared to 1,070,000 overnight visitors who spent approximately \$1.6 billion in the region.”**

Given that of course overnight visitors pay for accommodation, this exaggerates the spend differential between day trippers and overnighters. Day trippers contribute to the viability of many Noosa businesses, some of which are heavily dependent on the day tripper sector.

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Page 7 **Visitor Comparisons 2022**

This table conflates 2019 figures for international visitors with 2022 figures for intrastate, interstate and daytrip visitors. This is not a valid comparison.

Page 10 **“in August 2023, Trip Advisor noted that visitors to the region ranked Noosa Shire’s top attractions as being: Noosa National Park, Noosa Main Beach, Noosa River, Noosa World Surfing Reserve, Noosa North Shore, Noosa Hinterland”**

A review of the Trip Advisor website shows the actual 2023 top attractions which are much more diverse than those selected in the Discussion Paper.

1. Noosa National Park
2. Noosa Main Beach
3. Noosa Farmers Market
4. Noosa River
5. Peregrian Beach
6. Tracey Keller Gallery – Noosa
7. Noosa Visitor Information Centre
8. Lake Weyba
9. Hastings Street
10. Everglades
11. Mount Tinbeerwah
12. Tewantin National Park
13. Laguna Lookout
14. Little Cove Beach
15. Peregrian Beach Markets
16. Noosa Arts Theatre
17. Boiling Point Brewing Co
18. The J
19. Tee Tree Bay Beach
20. Sunshine Coast Private Transfers
21. Noosa Marina Sunday Markets
22. Boiling Pot Lookout
23. Essential Bodywork
24. Phillips Gallery
25. Eco Noosa River Adventures
26. Noosa Regional Gallery
27. Noosa2Fraser 4WD Hire
28. Wooroi Day Use Area
29. Dolphin Point Lookout
30. Hell’s Gates

https://www.tripadvisor.com.au/Attractions-g261678-Activities-Noosa_Sunshine_Coast_Queensland.html

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Page 12 **Visitor Accommodation**

“Only 8% of room stock in Noosa Shire sits within a hotel, motel or resort previously defined as ‘commercial accommodation’”

“Strata title apartments account for 47% of all visitor accommodation, while collectively, apartments, townhouses, duplexes, and dwelling houses account for 79% of all holiday accommodation in the region.”

Page 20 **“Noosa Shire has around 5,200 STA properties, many are in residential-zoned neighbourhoods.”**

“STA accommodation provides 80% of all tourist accommodation for visitors.”

These statements conflate residential dwellings with individually owned resort units with original development approvals for visitor accommodation, thus leading to confusion about the proportion of genuine resort apartments which are legitimately used for short term accommodation.

Page 16 **Traffic Management**

“There are approximately 1,700 car parks in the Hastings Street precinct.”

This appears to be incorrect.

Referring to the ‘Traffic, Pedestrian and Parking Survey Data Collection Summary’ tabled at the Council Meeting in July 2018, the definition of Hastings Street Precinct was clearly delineated as can be seen in the map below. The Hastings Street Precinct was found to have 389 car spaces, not 1700 as reported in the DMP Discussion Paper.

Overall Summary of Parking Availability

