

# NOOSA PARKS ASSOCIATION Inc.

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Chief Executive Officer  
Noosa Shire Council  
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Dear Sir,

Re Submission - Proposed local law – Short Stay Letting and Home Hosted Accommodation (revised)

In principle, Noosa Parks Association (NPA) endorses the concept of a shared economy. However, the unregulated state of the present Short Stay Letting (SSL) in Noosa is antithetical to NPA's 5-year Strategic Plan (2020 – 25) and most notably with objective 5: "To negotiate a social contract between Noosa residents, businesses, and visitors that protects the environment and improves the experience of all parties" (2020, p. 1).

The negative social impacts of SSL (and associated challenges) are not only well documented in the scientific literature, but acknowledged by Noosa Council in their own commissioned [Issues Paper](#) (12 February 2019). What stands out in the Noosa context however (and unlike many of the case studies referenced in the Paper), is that our community has a social and environmental capital that is unique in Australia. SSL has the very real potential to erode this community capital. Noosa's history, Biosphere Reserve and national park designation, and current status (for example, as the [Top Tourism Town](#) in QLD) demands a highly conservative approach be adopted with respect to SSL regulations and policies.

Accordingly, NPA supports Council regulating SSL within the Shire through both the Planning Scheme and a Local Law, as unfettered proliferation of SSL has the potential to cause harm to Noosa's image and the quality of life of residents. We believe that such regulation should be informed by an overarching Council Policy on SSL which seeks to ensure that SSL do not affect:

- the sustainability of Noosa's tourism product;
- the amenity of local residential neighbourhoods; and
- the affordability and availability of permanent rental accommodation

In recognising the need to implement some form of regulation in the short term, NPA supports:

- the proposed one-off application and annual renewal for a premise used for short stay letting or home hosted accommodation, on the proviso that annual renewal of the licence is not automatic, but dependent upon the applicant demonstrating that they have acted as a good neighbour and that this is supported by local residents; and
- the concept of a local contact person managing a short stay let premises, who is available 24/7, is located within 20 minutes travel and able to respond to complaints within 30 minutes.

With regards to the proposed Local Law, the NPA believes that Council has a responsibility to ensure that SSL operate within the Local Law and stated code and this role should be made more explicit within the Local Law. To achieve this, the NPA believes the following clauses should be added to either Section 5 or 6 of the proposed subordinate Local Law. The aim being to ensure (1) local residential amenity is protected, (2) SSL owners clearly understand their obligations and (3) the Local Law is enforceable and achieves positive community outcomes. Proposed additional clauses:

- Section 5: Council retains the power to impose a penalty for non-compliance with this Local Law; and/or cancel an owner's SSL licence should the operation of the SSL be demonstrated to be outside of the code of conduct and/or the cause of ongoing neighbourhood dispute; and
- Section 5 or 6: Where a resident believes that the local SSL manager/owner has failed to resolve their complaint, Council will act as an arbiter between the resident and the SSL designated local manager/owner (with the owner of the SSL to meet Council's costs).

Kind regards

Prue McGowan  
Honorary Secretary