DONNYBROOK BALINGUP
Chamber of Commerce & Industry Inc

Response to the Shire's Draft Economic Development & Tourism Strategy

6th October 2026 · Iain Massey, President, on behalf of the Chamber.

> *Γινομένη μὲν οὖν τοῦ ζῆν ἕνεκεν, οὖσα δὲ τοῦ εὖ ζῆν.* [The community] comes into being for the sake of life, but it exists for the sake of living well. — Aristotle, ***Politics*** I.2, 1252b.
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> *Economics as if people mattered.* — E. F. Schumacher, subtitle of ***Small is Beautiful*** (1973).

Executive Summary

This document is the Chamber's response to Lucid Economics' *Economic Development & Tourism Strategy*, Draft v3 (July 2026), with its *Background Report* (April 2026) and *Consultation Summary* (June 2026), as commissioned by the Shire of Donnybrook-Balingup and released for public comment.

An economic strategy is ultimately about how people in a place make a living and live well. Schumacher's case, half a century ago, was that economics loses its way when it forgets human scale. In this Shire, human scale is not a philosophy; it is the business profile. Most of our businesses are one or two people making a living, often from several sources, on their own land or in their own town.

The Chamber supports the draft Strategy's overall direction and its framing of the Shire as facilitator and enabler.

But the draft has a major blind spot: it barely sees the micro-businesses and self-employed people who make up almost nine in ten local businesses. The words "micro-business" and "sole trader" do not appear in it, while its recommendations single out "larger businesses" as a key catalyst.

This matters all the more because agriculture, rightly identified as the Shire's primary economic engine, is by ASBFEO's calculations the most small-business-dependent industry in Australia, with around 78% of its workers employed by small businesses.[1]

[1] ASBFEO, *Contribution to Australian Employment*, July 2025, p5.

The draft has other gaps. Our members consistently raise six problems with us, each of which is either missing from the draft or given low priority:

1. Planning decisions start from "No" rather than "Yes, if…".
2. The regulatory field is tilted towards larger businesses.
3. Mobile and internet coverage is poor and unreliable.
4. The Shire does not advocate for its small-business community on State and Commonwealth policy.
5. The skills shortage is made worse by a housing shortage that is not easing.
6. The Shire's policies and processes do not reflect how micro-businesses actually operate.

We discuss these in detail below.

Our Headline Requests

These are the seven amendments to the strategy we consider most urgent and important for our members.

1. Adopt an explicit micro-business lens across the Strategy and Action Plan.
2. Raise the planning policy review from Low to High priority, with a culture of "Yes, if…", and published performance measures.
3. Replace the narrow event-telecommunications action with a High-priority digital connectivity advocacy program.
4. Broaden the Shire's advocacy from seeking grants to arguing for fairer policy, alongside the Chamber.
5. Add fast, practical housing measures for workers: ancillary dwellings, tiny homes and worker accommodation.
6. Give the recommended Economic Development and Tourism Officer a clear small-business remit.
7. Add to each Action Plan item an owner, accountabilities, timeframes and measurable KPIs.

Whom We Represent

The Shire's economy is overwhelmingly micro-business. The *Background Report*'s own figures (Figure 3.3, ABS 2024) show:

Business size	Share of Shire businesses
Non-employing	70.5%
1–4 employees	17.4%
5–19 employees	10.1%
20–199 employees	2.0%
200+ employees	0.0%

That is, **88% of the Shire's businesses have fewer than five employees**. The true share is higher still: as the *Background Report* notes, ABS statistics exclude sole traders not registered for GST, and therefore undercount home-based and part-time operators.

What the numbers don't show is how these businesses work:

- **Owner-operators do everything.** There is little time or energy left for policy, forums or strategy workshops.
- **Many are but one part of a household income portfolio** - what we call the "crofting" model: a bit of produce, a farm stay, some contract or professional work, perhaps a part-time off-farm job. Rules written for single-purpose, full-time businesses fit them badly.
- **Few can take on trainees or apprentices**, and most cannot absorb a slow regulatory approval, a missed booking, or a few days without reliable internet.
- **They often carry State and Commonwealth compliance burdens**, and frequently blame the Shire for them – which is one reason the Shire should be seen to advocate for them.

The Chamber has around 100 members, drawn from across Donnybrook, Balingup and surrounding localities. The Preston Valley is under-represented in our membership and, we feel, in the consultation too.

Our six core concerns and seven headline requests are based on what our members, and other Shire-based businesses, consistently tell us.

What The Draft Gets Right

The Chamber welcomes and supports:

- **The Shire as facilitator and enabler**, working through coordination, planning, promotion and advocacy.
- **Housing as a critical constraint** on population, workforce and business growth.
- **Tourism accommodation and bookable experiences** as the main gaps in the visitor economy. Our visitors come for scenery, serenity, local produce, festivals and events rather than big-ticket attractions, and they need somewhere to stay.
- **Agricultural value-adding and agri-tourism**, which suit small producers and the crofting model particularly well.
- **Partnering with the Chamber** to deliver business workshops; and we would add the need to address a history of very low engagement with such offerings; whatever is offered needs to be better suited to the needs of micro-businesses.
- **Exploring onsite infrastructure solutions** for rural residential and visitor accommodation.
- **Planning and regulatory factsheets** for food businesses and accommodation.
- **Hiring an Economic Development and Tourism Officer**.
- **A family day care event**. This is mentioned in the Action Plan but not explained elsewhere. We take it to mean an event promoting family day care opportunities, which would be a practical step for workforce participation, and itself a micro-business opportunity.

Our Six Concerns

This section analyses the six core member concerns we nominated above, and outlines our proposals for addressing them.

1. Planning: from "No" to "Yes, if…"

- **What members experience.** The first answer from Planning is too often "No". For a micro-business, a refusal or a long delay is frequently the end of the idea. There is no in-house planner and no budget for a second attempt.

> In recent weeks, we have been made aware of two realistic initial proposals, both with tourism benefits and sound precedents, that have been effectively knocked on the head with an immediate "No."

- **What the draft says.** The Planning pillar promises an "efficient and customer-focused planning regime". Yet the one action that would change practice — reviewing planning policies to reduce barriers — is rated **Low** priority. The High-priority actions are factsheets and land supply. Factsheets help, but they explain the existing rules; they do not change how discretion is used. Land supply, while important, does not change how land use decisions are made.
- **What we ask.**
  - Raise the planning policy review to **High**, with a report to Council within 12 months.
  - Adopt a stated (published) "Yes, if…" approach in Planning: the first response to a proposal should be "Not quite there, let's work on it together", not "No."
  - Use the available planning discretion in favour of small-scale, low-impact business uses on rural and lifestyle properties, including roadside produce stalls.
  - Offer a free pre-lodgement conversation for small proposals, with one named staff contact to see them through.
  - Publish simple performance measures, such as time to decision for small applications.

2. A regulatory field tilted towards larger businesses

- **What members experience.** Fees, documentation and conditions are largely the same whether the applicant is a large company or a one-person business. Fixed compliance costs fall hardest on the smallest operators. Local procurement is not visibly structured to give local suppliers a fair go.
- **What the draft says.** Its first recommendation asks Council to acknowledge "the important role that local growers and larger businesses in the Shire play as a key catalyst". We don't dispute that. But there is no matching acknowledgement of the *micro-businesses* that are nearly nine in ten local firms, and no action on proportionate regulation.
- **What we ask.**
  - Add an equivalent recommendation recognising micro-businesses and the self-employed.
  - Apply a micro-business impact check to new local laws, policies and fee schedules.
  - Scale fees, reporting requirements and conditions to the size and risk of the proposal or business.
  - Recognise the crofting model in planning policy, so that mixed small-scale uses on lifestyle properties are enabled rather than treated as anomalies.
  - Adopt a consistent, transparent "local first where possible" procurement policy, and encourage other local institutions to do the same.

3. Digital connectivity

- **What members experience.** Mobile and internet coverage across much of the Shire is poor and unreliable. For a small business this means failed EFTPOS transactions, delayed banking, missed bookings and enquiries, and difficulty trading online. It also deters the remote-working professionals the Shire hopes to attract, and it is a safety issue in bushfire season. Visitors using the Bibbulmun and Munda Biddi trails, and the arterial roads, are often out of reliable mobile coverage.

> A recent event, which attracted thousands of visitors, installed an alternative digital data service. There were still EFTPOS drop-outs, and emergency services personnel were unable to communicate by SMS on site.

- **What the draft says.** Almost nothing. The only telecommunications action is funding for *event* telecommunications infrastructure, rated **Low**. Meanwhile, event traffic signage is rated **High**. The *Background Report* identifies skilled worker relocation, professional services, and health care as growth opportunities, and the *Strategy* wants more bookable tourism experiences. All of these depend on reliable connectivity.

- **What we ask.**

    - Document digital connectivity as an explicit constraint in the Strategy, alongside housing.

    - Replace the event-telecommunications action with a **High**-priority connectivity advocacy program: map black spots and dropouts with residents and businesses, then pursue State, Commonwealth and carrier investment.

    - The Chamber will help gather evidence from members.

4. Advocacy that stands with local business

- **What members experience.** When problems arise from State or Commonwealth policy, the Shire tends to say it is powerless. Local government is not powerless: it has a formal voice, access to Ministers and agencies, and the collective weight of the local government sector.

> An established accommodation business, after a series of regulatory demands from State agencies, including one requiring training irrelevant to its operations, has been put up for sale. The Shire has not, to our knowledge, taken up any of these issues on the operator's behalf.

- **What the draft says.** Advocacy is framed almost entirely as seeking funding — for event signage, event infrastructure, rail trails and a produce facility. Grants matter, but policy advocacy is missing.

- **What we ask.** Broaden the Advocacy pillar to include policy advocacy, developed jointly with the Chamber, on issues such as:
    - Digital infrastructure provisioning
    - Skilled migration settings for regional employers
    - Regulation of micro-abattoirs and custom kills, which currently limits small livestock producers' value-adding
    - Regulation of roadside farm stalls, and their signage on main roads
    - Housing and planning settings controlled by the state
    - The cumulative compliance burden on small operators.

A shared advocacy agenda, reviewed annually, would give the Shire's voice more weight and show our members that the Shire is on their side.

5. Skills and housing

- **What members experience.** The skills shortage has eased somewhat, but the housing crisis has not. Employers who find a suitable worker often cannot find them anywhere to live. The *Background Report* confirms housing availability is "close to zero" and local unemployment was 2.5% in September 2025.
- **What the draft says.** It rightly treats housing as a critical constraint, but its main action is ensuring sufficient residential land. That is necessary but slow. The *Background Report* also suggests that because housing is constrained nationally it "does not put the Shire at a competitive disadvantage". That is cold comfort to a local employer competing with Bunbury for the same worker.
- **What we ask.** Add faster, lower-cost measures within the Shire's control:
    - Remove unnecessary barriers to tiny homes, ancillary dwellings, cluster development, and other innovative housing on existing lots, using available planning discretion and streamlined approvals.
    - Encourage seasonal and worker accommodation on rural properties.
    - Support small employers to share trainees and apprentices, for example through facilitating group training arrangements.

6. Understanding how micro-businesses work

- **What members experience.** Shire processes assume an applicant with time, staff and a single full-time business. Most of our members have none of these.

- **What the draft says.** Its coordination actions rely on workshops and stakeholder forums. These reach the businesses with time to attend, which are rarely the smallest. The consultation list of 19 stakeholders leans towards established organisations and larger businesses, with little representation from sole traders or the Preston Valley.

- **What we ask.**

    - Design engagement for time-poor owners: short sessions, evenings, online options, and going to them rather than asking them to come.

    - Keep and publish statistics on business registrations and deregistrations in the Shire, so trends are visible.

    - Give the proposed Economic Development and Tourism Officer an explicit small-business and micro-business remit, including being a single point of contact for small operators dealing with the Shire.

Proposed Amendments to the Action Plan

The changes below would give effect to meeting our concerns within the draft's existing four-pillar structure.

Pillar	Action	Priority in Draft Strategy	Chamber Proposal
Planning	Review planning policies to reduce barriers	Low	High; report to Council within 12 months
Planning	*New:* "Yes, if…" approach, free pre-lodgement advice and a named contact for small proposals	—	High
Planning	*New:* publish time-to-decision for small applications	—	Medium
Planning	*New:* encourage tiny homes, ancillary dwellings and worker accommodation on existing lots	—	High
Planning	*New:* recognise crofting-style mixed uses on lifestyle properties	—	Medium
Coordination	Partner with the Chamber to deliver business workshops	High	Support; design for time-poor owners (short, evening, online)
Coordination	Establish ongoing stakeholder forums	Medium	Support; include micro-business and Preston Valley voices
Coordination	*New:* micro-business impact check on new local laws, policies and fees	—	High
Coordination	*New:* "local first where possible" procurement policy	—	Medium
Coordination	*New:* publish business registration and deregistration statistics	—	Low
Advocacy	Funding for event telecommunications infrastructure	Low	Replace with a connectivity advocacy program, High
Advocacy	Funding for event traffic signage	High	No objection, but should not outrank connectivity

Pillar	Action	Priority in Draft Strategy	Chamber Proposal
Advocacy	*New:* joint Shire–Chamber policy advocacy agenda, reviewed annually	—	High
Resourcing	Economic Development and Tourism Officer (Recommendations)	—	Support, with an explicit small-business remit
All	All	—	Add accountabilities, timelines, ownership and assessable KPIs
All	All	—	Add linkages and coordination between initiatives – many will bear on, or synergise with, each other.

Other Issues with the Draft

- **A drying climate.** The draft lists "reliable water access" as a competitive advantage. Our members see declining stream flows, stressed tanks, dams and bores, and rising bushfire risk. A strategy built on agriculture and nature-based tourism should plan for this, not assume it away.

- **Regional food security and the energy transition.** Both bear directly on local producers and small businesses, and on the resilience and sustainable prosperity of our community, and both are absent from the draft.

- **Wine industry.** The Shire is home to a small but well-regarded wine industry, which fits very well with the overall direction of primary production and agri-tourism. The *Background Report* notes the Shire's premium wineries and over 1,000 tonnes of wine grapes, but the Strategy does not mention the industry, and apart from one fruit-wine producer, no wine industry representatives were consulted.

- **Different places, different trajectories.** Donnybrook, Balingup and the Preston Valley differ in geology, demographics, history, culture and direction. Donnybrook has a sizeable commuter population drawn by Greater Bunbury; Balingup and the Preston Valley much less so. The tourist attractions of individual towns also vary. Actions should be tailored accordingly rather than applied Shire-wide by default.

- **The Action Plan is difficult to evaluate** in the absence of accountabilities, timeframes, funding pathways and assessable KPIs. It is not clear from the draft how the success or otherwise of this strategy will be evaluated.

Corrections and Queries

These are offered in a spirit of helpfulness before the documents are finalised.

Document	Location	Issue
Draft Strategy v3	Executive Summary, p. i	A sentence is broken mid-way: "To support this, the Strategy (This Strategy provides… Figure E.1) is structured…".
Draft Strategy v3	pp. 4–5	Infographic pages are placeholders.
Draft Strategy v3	Section 4.1	"Reliable water access" — see our Other Issues section above.
Background Report	Section 3.3.4, p. 20	Mining section begins "Manufacturing is the 2nd largest industry" and refers to "key manufacturing sub-industries"; should read Mining?
Background Report	Section 3.3.4	Iron ore mining is shown as the largest mining sub-industry ($32.8m). Please confirm this is correctly attributed to the Shire. We are not aware of iron ore mining in the Shire at any commercial scale.
Background Report	Table 2.5	The last household-income row repeats "Augusta-Margaret River" with Donnybrook-Balingup's figures.
Background Report	Section 5.2	Retail trade growth is quoted twice with different figures.
Both	Exec Summary / Section 2	"stimy" should be "stymie".
Consultation Summary	Section 1	Describes the Shire as "centred around the township of Donnybrook"; Balingup and Preston Valley readers will contest this. Business activity actually spreads along two main arteries leading from Donnybrook: The South Western Highway and the Donnybrook-Boyup Brook Road.
Consultation Summary	Section 2.2 Stakeholders Consulted	Barr and Standley are not based in the Shire, and do not have an office in the Shire, although they do a lot of business here. A fruit winery proprietor was consulted. No vineyard owners or vignerons were consulted.

The Chamber's Offer

The Chamber is ready and willing to be a practical partner in delivering this Strategy. Specifically, we can:

- Co-design and promote the business workshops so they reach the owners who most need them
- Gather evidence from members on connectivity, planning experience and housing for workers
- Develop and pursue a joint advocacy agenda with the Shire
- Act as a first point of contact and sounding board for the proposed Economic Development and Tourism Officer.

We would welcome a meeting with Shire officers and Lucid Economics to discuss these proposals before the Strategy is finalised.

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