



FNQ Draft Regional Plan Feedback
Department of Infrastructure and Planning
PO Box 5194
Cairns Qld 4870

8 August 2008

Submission on the Draft FNQ2025 Regional Plan and related State Planning Regulatory Provisions

The Cairns and Far North Environment Centre (CAFNEC) thanks the Queensland Government and its Department of Infrastructure and Planning for the opportunity to comment on the draft FNQ2025 Regional Plan (the Draft Plan).

Since early 2007, CAFNEC has invested intensive effort in engaging with the FNQ2025 regional planning process. In order to facilitate the broadest extent of community involvement, CAFNEC formed a Steering Committee to inform and direct our input into the planning process in late 2006. CAFNEC regularly attended Technical Working group meetings, frequently met with government planners, and conducted a dedicated program of engagement including numerous regional community forums, which DIP planning staff participated in and supported. CAFNEC also organised meetings with many local and regional conservation groups operating within the FNQ region to discuss the Draft Plan, including Kuranda Envirocare, C4, Douglas Shire Sustainability group, Johnstone Ecological Society, The Wilderness Society, Cairns Action for Sustainable Transport (CAST), Terrain NRM Ltd, and Environmental Defenders Office of Northern Queensland. CAFNEC conducted two conservation summits, involving a cross section of the region's conservation and environment groups in May 2007 and June 2008, to inform our engagement and position on the Draft Plan. In responding to the Terms of Reference for the Draft Plan, CAFNEC prepared an independent policy submission that included member input and culminated in the preparation of a public document on our position with respect to the Draft Plan.

On this basis, CAFNEC is clearly well placed to represent conservation sector interests in regards to the Draft Plan. Furthermore, our extensive consultation and engagement efforts have enabled us to gain a sound understanding of the key issues and concerns associated with the Draft Plan as held by local communities across the region.

CAFNEC did allocate substantial resources into engaging with the Draft Plan as we fully recognise its importance and potential in becoming a vehicle for building regional sustainability in Far North Queensland. While CAFNEC recognises that statutory regional planning in Queensland may be able to address some of the clear regulatory deficiencies of the *Integrated Planning Act 1997*, the regulatory weakness of local government planning schemes and the gaps in other relevant state and federal environmental regulations persevere. With tightening and amendment FNQ2025 may present a solution to address key failings in State and local government regulatory processes in providing for a long-term, regional focus on ecological sustainability.

The Draft Plan provides an opportunity to address several flawed assumptions and poor outcomes associated with the FNQ2010 Plan, which generated further urban sprawl and lacked a set of clear institutional arrangements to implement positive environmental strategies.

CAFNEC recognises the value of regional planning in ensuring consistency of decision-making throughout local government jurisdictions, and throughout the terms of different council administrations. FNQ2025 may assist in providing an additional level of accountability and security by reinforcing the directives of individual planning schemes in matters of regional environmental significance.

With certain reservations CAFNEC supports this initiative and the opportunity to contribute and participate in discussions contributing to the development of the Draft Plan. However, we are concerned that the timeframes allowed were inadequate for widespread community involvement and that stakeholder consultation may have been inadequate. Considering the importance of this process for the region, it appears somewhat imprudent for the Queensland Government to provide such limited resourcing, restricted access to key mapping data and restrictive timeframes for full and intensive community and stakeholder input.

In part, the strategy, initiatives and intent of the Draft Plan represent a significant step forward for the region, in particular, the clear departure away from the trend towards facilitating low density urban sprawl into bush and farm land, which were implicit within the planning strategies of FNQ 2010. Overall, CAFNEC sees the Draft Plan as a success, with scope for improvement.

In summary, CAFNEC supports the following aspects of the Draft Plan:

1. A regional planning approach that seeks to achieve Ecologically Sustainable Development (ESD) through placing limits on urban sprawl and increasing the protection of natural and cultural assets.
2. The concept of a defined Urban Footprint as a tool for limiting the growth of suburbia.
3. Limiting rural residential subdivision as a means of preventing loss and fragmentation of habitat, the protection of amenity and good quality agricultural land and retaining the 60ha maximum for associated subdivisions.
4. Areas of ecological significance that are mapped and referenced.
5. The provision of bicycle transport infrastructure in policies 2.4.6 & 8.1.5.
6. A focus on Transport Oriented Communities as outlined in policies 8.1.1 -8.1.10, along with aligned policies 8.1.A-8.1.E
7. The recognition of the habitat values of Mission Beach and the Daintree as reflected in the tight urban footprints mapped for these areas.
8. No further integrated resort development outside the urban footprint.
9. Hillslopes over 1:4 in the urban footprint and over 1:6 in RLRPA are not to be developed.
10. No urban growth node in Myola for the duration of the plan.
11. No urban growth node in Clohesy- Koah for the duration of the plan.
12. No expansion of 4-lanes for the Kuranda Range Road.
13. Directing urban development away from the coast.

Nevertheless, CAFNEC holds major concerns and reservations with the Draft Plan in its current form, predominantly in regards to wildlife corridors and threatened species and ecosystems, "exemptions" within the regulatory provisions; a lack of clearly achievable directives and ambitions for transport and energy efficiency and the capacity of the Plan to be implemented and properly resourced. Furthermore, given the likelihood of strong climate change impacts to our region and an impending peak oil scenario, the resilience of both our natural and human communities must be enhanced through proper planning that is initiated now, rather than 5-10 years into the future.

Therefore, the key aspects of the Draft Plan that CAFNEC recommends be amended include:

Section 1.1 – Biodiversity Conservation.

- areas of ‘high ecological significance’ should be protected by appropriate declarations to that effect in existing or new State Planning Policies;
- areas of ‘general ecological significance’ should be protected by amending the Regulations to require all types of development on land within (either wholly or partially) such areas of ‘general ecological significance’ to be Impact Assessable.
- Remove the words “and offset” in Land Use Policy 1.1.2.
- Map 5 “FNQ Areas of Ecological Significance”, must be provided as a series of cadastrally-based maps at a scale appropriate to making decisions at a ‘lot’ scale (i.e. at least 1:50,000);

Section 6.3 - Energy.

The following must be set for adoption by each local council within the region and be included in the FNQ2025 as additional Land Use Policies:

- 6.3 – Energy efficiency targets and minimum efficiency requirements for new buildings and renovations.
- 6.3.5 – Baseline minimum energy efficiency and reporting targets.

Section 7.1 – Water Quality

- The set-back distances for Riparian Zone widths within urban areas in the Explanatory Notes in 7.1 be adopted as a minimum standards and included in the statutory provisions, and or/ referred to in an amended 7.1.1.
- An additional Riparian Zones map should be produced at a scale appropriate to make decisions at a ‘lot’ scale (i.e. at least 1:50,000).

Section 8.1 – Integrated Transport and Land Use Planning

- Remove the 15 story, 150 dwellings per hectare model proposed for TOC Type 1 (Table 9 Transit oriented communities—typology for Cairns) as it will have limited application for the region. Other high density options, that retain the characteristic ocean to hill vista, should also be canvassed through public consultation.

Section 8.4 – Sub-regional Transport.

- A timetable for the funding and establishment of a regional public transport coordination authority within three years is recommended.
- Public transport targets should be raised significantly to a level that would reflect a 40% public transport usage by 2025, with an aim for a capacity of 60% public transport usage in this timeframe.

Part F- Implementation, Monitoring and Review

- A review of the plan should occur no less than every five years. In conducting such a review, extensive community consultation should occur at a standard at least as high as that set out in Schedule 1 of the *Integrated Planning Act 1997* (Qld) (“Process for making or amending planning schemes”); this minimum community consultation requirement should be clearly spelt out in the “Community involvement in implementation” section.
- A biennial review of the status of the region should be produced by the DIP, in cooperation with the regional councils.
- The 2025 plan should contain a set of suggested Sustainability Indicators, Targets and Thresholds which are monitored continuously and which trigger decisive intervention and remedial action when breached. Though such indicators are currently not well described, the requirement for the monitoring of performance in all Regional Policy areas should be included as a Land Use Policy in each section. Examples of key Sustainability

Indicators include: wildlife corridors connectivity index, acreage of remnant vegetation, protected area loss/gain, carbon footprint, local species extinctions, water consumption, recycling levels, etc.

In the following pages, we include a detailed '**Commentary and Detailed Amendments**' and a set of suggested **Amendments to the State Planning Regulatory Provisions**. The Commentary and Detailed Amendments provide additional recommendations for amendments with supporting information provided on the key issues.

CAFNEC congratulates the State and the DIP staff on significant effort in crafting a new and more sustainable vision for the FNQ region and we look forward to the finalisation of this Plan in a form that enables this vision to be achieved.

Sincerely,

A handwritten signature in black ink that reads "Elaine K. Harding". The signature is written in a cursive style with a large, sweeping flourish at the end.

Dr. Elaine K. Harding
Coordinator
Cairns and Far North Environment Centre

Commentary, Recommendations and Amendments

Part B: Regional Vision

Whilst the Draft regional vision articulates many key environmental components and concepts, one aspect which could have been given greater acknowledgement is that “abundant and viable wildlife communities are able to maintain their populations throughout the regional landscape in perpetuity”.

The need for reflecting the uncertainties and changes presented by Climate Change is extensively acknowledged, but no mechanism for ensuring emission reduction is established. This begins in the regional vision and remains a constant throughout the entire plan.

Part C: Strategic Directions

Firstly, CAFNEC agrees and fully supports certain aspects of the Strategic Directions outlined in the Draft Plan, including: 1) the commitment and intent to protect the regional landscape features from urban sprawl and to limit rural residential subdivision; 2) genuine attempts to address the causes and impacts of climate change; 3) planning for land and energy efficient urban design; and 4) significantly reducing urban pressure on the coast, for both environmental reasons and future safety from natural disasters.

However, greater attention could have been given to not only economic diversification, but economic *localisation*- i.e. developing robust and viable local economies - in particular local food economies, which will insulate the FNQ community against fluctuations in the global economy and any food and fuel security issues which now seem impending. Also, little consideration has been given to supporting sustainable agriculture and horticultural industries, which are in fact synonymous with viable local food economies. CAFNEC is concerned that the Draft Plan may in fact inhibit and penalise these important aspects of sustainable, local food production and supply,.

CAFNEC also has concerns regarding the Plan's emphasis on the role of Mt Peter in accommodating such large levels of future growth.

The worth and effectiveness of the Draft Plan will depend on a firm commitment from the government to provide quality infrastructure in a strategic, supply-led fashion. Therefore, some indication as to which infrastructure projects will be supported by the plan is crucial at this point to inform community deliberation and analysis.

Specific Amendments include:

1. Protecting regional landscape and rural production values

Under the list of landscape values which the Regional Landscape and Rural Production Area includes, the value “movement and migration of wildlife throughout the landscape” should be included, in place of the more generic term of “natural values”.

2. Addressing the causes of climate change and impacts

Add to the last sentence...“*Strategies must be developed to provide for adaptation and to build resilience to such impacts*”. Localising food economies, increasing choice of transport modes available to residents, and investing in alternative energy sources are examples of such strategies.

3. Urban consolidation and land use efficiency

CAFNEC questions the claim “Within future urban growth areas, the regional plan will ensure there is a move toward affordable housing and energy efficient and sustainable communities”, as the mechanisms provided by Darft Regional Plan do not appear adequate to achieve this goal on a consistent basis across the region.

Part D- Regional Land Use pattern

Whilst there is much argument as to the accuracy of the QLD government’s population projections, CAFNEC accepts that any forecasting must be based on assumptions and therefore provides a basic guide only. Therefore, we do not challenge the population’s projections produced by the Qld government’s Planning Information Forecasting Unity (PIFU).

The move towards providing diverse housing stock for a changing demographic in which smaller household occupancy numbers will increase, is supported by CAFNEC. These higher density dwellings are recommended to be integrated into traditional suburbs and around neighbourhood centres, rather than small areas and streets dominated by flats and units (which generally lead to socially disadvantaged areas with higher crime rates).

CAFNEC also supports the assertion that the current trend towards further rural residential subdivision on the urban fringe is unsustainable and unnecessary in the life of the Plan. Furthermore, we see the ability to address and curtail this trend as one of the primary benefits of the Regional Plan towards progressing regional sustainability.

Preferred pattern of development

CAFNEC is a proponent of a polycentric approach to appropriate regional development, which focuses proportionate rate of growth in all significant regional centres, including Cairns, Innisfail, Atherton, Tully and Mareeba, all of which have an existing level of infrastructure and services to cater for an increase in demand. To some extent this mirrors the preferred pattern of settlement outlined in the Draft Plan, however there is a disproportionate emphasis on growth in Cairns. This presents the following possible issues:

1. Cairns is a low lying coastal environment which is highly exposed to natural hazards such as sea level rise, flooding and cyclones, all of which will be exacerbated by climate change.
2. Opportunities to reinvigorate the existing economies of regional centres will not be realised.
3. Disproportionate level of services and opportunities will be centred in Cairns at the expense of other regional communities.
4. Residents of areas outside Cairns will need to commute long distances to access many specialist services and employment, as the trend towards centralisation is exacerbated.
5. Given the identified threats of Peak Oil and Climate Change, the provision for a level of potential self reliance in relation to food production is desirable. This potential could be undermined by excessive centralisation of the regional population.

Whilst CAFNEC acknowledges that it is appropriate to focus 50% of new growth to the Cairns region, in proportion to the current regional population densities, however the proposed 70% may be too high for the reasons outline above.

CAFNEC supports the further development of Mareeba as an industrial centre and a service centre for mining activities further west. However this highlights the need for

Mareeba to be achieve higher levels transit orientation and the need for investment into rail freight infrastructure and other alternatives to road based transport.

Transit Oriented Community

CAFNEC supports moves towards transit oriented communities. However, we have concerns that the concept of transit-oriented communities, identified in the Draft Plan, will amount to a transit-oriented activity centre within the Mt Peter development and a rapid bus way along the southern corridor to Cairns centre in the short term. Whilst these developments will be welcome, they do not address the need for transit orientation in Cairns centre, Smithfield and Edmonton and regional town centres in the rest of the region. The principles of transit orientation must be applied throughout the region consistently, if we are to significantly reduce our greenhouse gas emissions, assist in insulating our communities to the rising cost of fuel and provide real alternatives to car based travel.

The Draft Plan states that the towns of Atherton, Innisfail and Mareeba have not yet *approached a critical mass of population to support public transport*. CAFNEC rejects this assumption in a post peak oil scenario where every community of 5,000- 10,000 or more people or more will need a serviceable mass transit system. The so-called “critical mass” is calculated on current public transport usage rates that are very low.

CAFNEC also feels that the Infrastructure budget should allow for a “urban regeneration” allocation, for the retrofitting of existing town and neighbourhood centres towards increased transit orientation.

Age Distribution and Household structure

As stated in this section (p 14), the combined phenomenon of an ageing population and the FNQ having a higher than average proportion of elderly people (particularly in the Tablelands), will of course create more demand for medical services. CAFNEC maintains that this represents an emerging and pressing need to expand de-centralised regional service delivery, including health services and regional hospitals.

Short term (0- 10 years)

CAFNEC applauds the Draft Plan’s focus on establishing an intergovernmental transit oriented communities taskforce to progress the planning of transit-oriented communities. CAFNEC stresses the importance of involving community and consumer representatives in this taskforce, including ourselves, and the Cairns Action for Sustainable Transport (CAST) group. CAFNEC calls for a regional transport coordination authority to be established within three years.

Medium term (10-20 years)

As indicated in this section, budgeting and delivery of the public infrastructure around the key transit oriented communities sites at Edmonton, Palm Cove, Redlynch, Earlville and Gordonvale will occur in the medium term period of 10 to 20 years. However, our community needs the provision of such important infrastructure in the immediate future. Even conservative peak oil projections claim that we will be living with radically more expensive petrol in the next ten year period (which is also stated on p30 of the Draft Regional Plan), so it is imperative for the Queensland government to begin to provide transit orientation immediately.

It is also stated that in this term both the Kuranda Range four lane highway and Myola urban development proposals will be reviewed. CAFNEC strongly maintains that both of these proposals are dropped, with no review date set within the life of this Plan.

Other development options

The Draft Plan represents a positive change in relation to the planning strategies of FNQ 2010. In particular, we support the removal of satellite cities at Myola and Koah/ Clohesy, and the suspension of Kuranda Range Road upgrade.

As mentioned above, the Myola urban area proposal has not been completely removed from the agenda, as the Draft Plan suggests that this proposal may be revisited in the longer-term future.

CAFNEC commends the discontinuation of any investigation into urban development at East Trinity.

State planning regulatory provisions

1. Regional Landscape and Rural Production Area.

The RLRPA should include a provision for wildlife movement throughout the region within this category. This would most feasibly be in the form of Integrated Reserve system design, which is a policy model that is well tested in Canada and USA, and has been implemented through regional plans similar to this one. This involves a system of identifying high value ecological core areas, buffer zones and linking corridors throughout the regional landscape which are protected by a system of environmental overlays, thus ensuring connectivity between protected areas and both within and outside urban areas.

CAFNEC supports efforts to retain land for agricultural and conservation purposes, and recognises that minimum lot sizes in rural areas are arguably the most effective way to do this. However, CAFNEC has concerns that a 60 ha minimum land holding may prevent small scale, sustainable farming enterprises and cottage industries from appearing in our region. We challenge the assumption that only a large farm is a commercially viable farm, and feel that much smaller land holdings can still significantly contribute to regional agricultural yields. This rule may also penalise smaller scale horticultural industries, which may in fact be invaluable towards the localisation of food economies.

It is crucial to discriminate between the subdivision of large farms for the purpose of agricultural production as opposed to lifestyle blocks. If a planning mechanism could be developed to support the former and prevent the latter, then this would offer a more amenable solution than the strict 60 ha limit. Another alternative is to create a fourth land use category, to allow subdivision for small-scale commercial agriculture and horticultural industries, which can only be used for these purposes.

CAFNEC is also concerned about the two-year window for applications with the existing rural residential areas not included in the rural living area or the urban footprint. It is certain that in these areas, an acceleration of rural residential subdivisions will occur, resulting in outcomes contrary to the stated objectives of the Plan. This is of particular concern in the Mission Beach Coastal zone - Low-density residential precinct, and the Mareeba Shire rural residential zone, which includes Koah- Clohesy and Myola. All these areas include very high value, intact habitat, which planning measures, to date, have failed to protect. This small exemption could create huge problems in these areas, and should be removed.

The long period of development for the Draft Plan has already resulted in high numbers of development applications in these areas, many highly speculative and/or inappropriate. CAFNEC views the Queensland Government's creation of this situation as

poor policy that should not be compounded by further lengthy opportunities for the lodging of applications exempt from reach of this Plan.

Whilst CAFNEC recognises that the proposed “precinct planning” is an improvement on the prior arrangements, especially in relation to Integrated Resort development. CAFNEC remains concerned about large significant precincts within the regional landscape, especially those not serviced by any transport mode other than private vehicle.

2. Urban Footprint

CAFNEC supports the use of the Urban footprint area to contain urban growth into designated areas. A state mandated limit to residential development in peri-urban areas has arguably proven to be one of the most effective means of curbing sprawl and directing new development and investment into existing neighbourhoods and infill areas. Therefore, the implementation of such a measure in our own region is welcome.

Critical wildlife habitat and remnant vegetation continues to be lost due to a lack of stringent controls governing their protection. The Draft Plan states (p 26) that the *Vegetation Management Act 1999* (VMA) and local government planning schemes may protect some land within the Urban footprint. However, due to the so-called “urban exemption” in the VMA, this piece of legislation has proven to be ineffective in protecting remnant native vegetation in urban and residential areas. Local government planning schemes have also had limited success in protecting natural values. Designated protected areas within planning schemes are easily over-turned, amended or ignored by local authorities.

This highlights the need for significant habitat within the urban footprint to be given clear recognition and protection under the Draft Plan. Such areas would include wildlife corridors, essential habitat for threatened species, threatened ecosystems, riparian corridors, and wetlands, which are all identified in mapping prepared by the EPA and other agencies. Thus, an integrated network of habitat corridors is required. This network would be protected by statutory environmental overlays and enforced by local governments through standard development assessment process. Only such a mechanism will provide long-term protection of natural values within urban areas, and maintain connections across ecosystems in the regional landscape.

3. Rural living area

CAFNEC supports the commitment to not releasing any further land for rural residential subdivisions, and agrees that existing supply of this land use is more than adequate. However, as mentioned above, we have major concerns about the two-year window for development applications on existing rural residential areas that are not included within the Urban footprint or the Rural Living areas under the Draft plan. It is not necessary to create a further provision for the piecemeal fragmentation of these areas into lifestyle blocks. Therefore, this exemption should be removed.

Master planning

CAFNEC supports the model of master planning and structure plans for major new urban developments, such as Mt Peter, as it provides an additional level of regulation and accountability from the State government in the creation of new neighbourhoods. The importance of providing for genuine community involvement in the master planning process cannot be underestimated, and measures to ensure accountability to community values and concerns from the State government must be developed. CAFNEC also commends the use of master planning for existing centres, such as Atherton, Mareeba

and activity centres in Cairns, with the view to gaining improvements to transit orientation and creates more community friendly precincts.

Specific Amendments include:

- 1 Provision for small scale urban agriculture, market gardens, etc. should be included in the Urban Footprint and within the RLRPA.
- 2 RLRPA is now 96% of FNQ's area; an additional category for areas of high ecological significance would be desirable.
- 3 In the sentence on p 26 under the subheading of Urban footprint "*This land use category may also contain constrained land, such as wetlands, floodplains, steep hill slopes or areas of high ecological significance, such as important habitat for rare or endangered species like the cassowary or mahogany glider, where development should not occur*", delete "*where development should not occur*" and replace with "*where development must not occur*".
- 4 Remove the exemption in Section 3 (Paragraph 3) on allowance of 2-year window for development applications on existing rural residential areas.

Part E- Regional policies

1. Natural Environment

1.1 Biodiversity Conservation

Generally, this section relies on the '*avoid, minimise and offset*' approach for assessable development that impact upon areas of 'high' ecological significance within the urban footprint and for projects in the RLRPA where there is an '*overriding need in the public interest for development*'.

Although the plan offers fairly strong protection of ecological values outside of the urban footprint, the general approach of allowing for the use of offsetting, especially in the already fragmented habitats within the urban footprint, does not adequately protect existing ecological values. The primary reasons that it fails to meet its stated objective is that areas of high ecological value already are under threat and offsetting is not a proven approach for maintaining these values. Studies undertaken in the US on wetlands mitigation program over the last 20 years under a federal 'no net loss' policy has identified that a significant proportion of ecological values continue to be degraded and not replaced through offsetting. Urban landscapes contain key values for many coastal species and therefore they require strong protection to ensure that local populations are maintained.

- 1.1.4 Remnant vegetation (not threatened) can continue to be cleared under the Draft Plan, as the wording in this section is that 'development avoids areas of general significance where possible.' Therefore, the region will continue to experience widespread loss of remnant vegetation as offsetting will likely add acreage to the protected area estate, but not to the total acreage of remnant vegetation.
- 1.1.5 The opportunity exists under this section for local government to '*identify and protect areas of high and general ecological significance within their planning schemes*'. In order to achieve improved conservation outcomes, it will be necessary for the regional councils to incorporate stronger regulatory mechanisms into their planning schemes. CAFNEC has witnessed the failure of planning schemes to protect such areas on countless occasions and has little faith in the ability of Local Government Planning Schemes, on their own,

to deliver real and lasting habitat protection. An overarching statutory approach to the protection of these areas is required.

Within the 'Aligned policies' area, existing impacts to wildlife corridors within high ecological significance areas are to be mitigated and general ecological significance areas are to be rehabilitated. In practice this means that degraded areas should be improved if they fall within the mapping of these two areas. However, the responsibility and resourcing for achieving this aim is unclear.

In summary, the identification of ecological significant areas is an important step in protection of regional biodiversity. This will greatly assist the planners with clarifying important habitats and linkages. However, impacts can still occur to these areas, with a strong reliance on the efficacy of offsetting, which has a weak existing policy basis and poor performance record in other countries.

CAFNEC highly recommends the development of statutory environmental overlays to protect regionally significant wildlife corridors. This opportunity has been overlooked by the State government, even though it has been successfully integrated into other regional planning exercises both within Australia and overseas, such as the Vancouver and Portland regional plans, and to some extent in the Melbourne 2030 regional plan.

Whilst many references to the importance of wildlife corridors are made in this section, no clear indication is given as to the achievement of long-term protection for these areas. On p 33 in the explanatory notes of this section, it is stated "*core areas of biodiversity significance are located within the protected area estate, the protection and enhancement of habitat corridors between these core areas is an essential policy outcome for the draft regional plan*"...yet CAFNEC has serious concerns that this will be impossible to achieve without statutory mechanisms.

Through the experience of the South East Queensland Regional Plan, it has become clear that clear statutory measures are required to halt the continued loss, fragmentation and degradation of critical habitat. The Draft Plan presents an important opportunity to address this problem, but without the clear and binding regulatory control of statutory environmental overlays, this will be impossible and our regions wildlife communities will continue to decline. The protection of such important corridors will also better equip our biodiversity for the challenges presented by a changing climate.

Given the continued fragmentation of critical habitat areas and associated pressures faced by Cassowary populations in the Mission Beach area, CAFNEC recommends that all development at Mission Beach be impact assessable.

1.2 Coastal Management

CAFNEC supports the Regional plan's intentions to steer further intensive development away from the coast. For many years, CAFNEC has opposed inappropriate development in low-lying coastal areas and highly visible coastal headlands on the basis of the safety, environmental and scenic amenity consequences of such development. Whilst any moves to prevent these types of development in the future is welcome, they can not reverse the legacy of decades of inappropriate coastal development approvals. The continuing damage and erosion of coastal habitat value from these past mistakes must be also addressed through the draft plan, and most importantly, through its Regulatory Provisions.

As with the limitations on further subdivision in the RLRPA, a limit placed of the ability activate historical use rights and approvals is required for the coastal zone. This is especially true for pre-IPA approvals. A mechanism for retiring pre-IPA approvals is required for approvals inconsistent with contemporary planning outcomes and a changing climate.

1.3 Air and acoustic environment protection

The best way to improve air quality, particularly in urban areas, is to reduce total vehicle kilometres travelled by motorists. Therefore, investment into public transport provides benefits in air quality and health. A reduction in noise from vehicle traffic will also create quieter neighbourhoods.

Specific Amendments include

1. Design and implement an integrated habitat network which builds upon the mapped wildlife corridors, and is protected from any development by statutory provisions. The core elements of this should include linking core habitat across urban areas with larger intact protected areas.
2. Areas of high ecological significance should not be offset. Their protection should be ensured through state and local planning policies
3. Remove the words “and offset” in Land Use Policy 1.1.2.
4. Essential habitat for key species, such as the Southern cassowary and Mahogany Glider should be mapped, referenced and fully protected within urban footprint.
5. Areas of ‘high ecological significance’ should be protected by appropriate declarations to that effect in existing or new State Planning Policies;
6. Areas of ‘general ecological significance’ should be protected by amending the Regulations to require all types of development on land within (either wholly or partially) such areas of ‘general ecological significance’ to be Impact Assessable.
7. Map 5 “FNQ Areas of Ecological Significance”, must be provided as a series of cadastrally-based maps at a scale appropriate to making decisions at a ‘lot’ scale (i.e. at least 1:50,000);
8. All development in Mission Beach should be impact assessable.
9. Develop a list of key species/ biodiversity indicators for each planning area within the region. Establish management targets and actions, and implement a monitoring program to report on these.
10. 1.2.2 -*“except in accordance with relevant policies of the state and regional coastal management plans”* be deleted, to read: *Development does not occur within the erosion prone area, within a coastal management district; or in a storm tide inundation hazard area, as shown in Map 6.*

Recommendations

1. 1.2.a - False Cape should be targeted for rehabilitation and restoration to its pre-cleared state.
2. Development proposal for an Integrated Development at Ella Bay is called in as contrary to the regional plan’s coastal management strategy.

2. Regional Landscape and Natural Resources

2.1 Regional landscape values

CAFNEC supports the development of a regional data collation and information exchange framework as referenced under the explanatory notes of this section.

The recently disbanded Aboriginal Rainforest Council (ARC) was engaged in a Cultural Heritage mapping project of the region, which would have applicability to such a framework and greatly assist in protecting cultural heritage features of the regional landscape. If the results of this mapping project are available, they should be referred to as part of the plan, and if they are not complete, it is recommended the State government invest in a similar organisation to continue this important work.

In the explanatory notes of this section, it is stated “Important wildlife corridors that link conservation areas may be found on privately owned farm land”...Again statutory environmental overlays can address this issue, as any such overlay across private land will retain the potential for this area to be used for strategic conservation purposes by restricting intensification of use.

2.2 Precinct Planning

CAFNEC supports the use of precinct planning, and sees it as an improvement on current planning arrangements.

2.3 Natural Resource Management

As mentioned in a previous section, CAFNEC is concerned about the repeated references to environmental offsets (as on p41 under explanatory notes), as this policy model is, as yet, undeveloped and has been proven to have limited use in gaining conservation outcomes in other regions and countries.

CAFNEC supports carbon sequestration and trading through forestry, however insists that plantations must be species that are native to our region, and preference given to forestry operations that value-add to regional biodiversity and habitat connectivity outcomes. Monocultures of introduced species such as teak and mahogany should be discouraged.

2.4 Scenic Amenity, outdoor recreation and inter urban breaks

CAFNEC highly supports the protection of hill slopes over 1:4 and coastal headlands and ridgelines in the urban footprint and rural living areas within the scenic rim. Development on scenic hill slopes has been rapidly eroding the outstanding scenic amenity of Far North Queensland (Cairns in particular), and any attempt to address this is very welcome.

CAFNEC supports the protection of slopes over 1:6 in the RLRPA.

CAFNEC also supports the use of inter urban breaks to retain the character of existing towns and neighbourhoods.

CAFNEC would also like to stress that provision of areas for outdoor recreation activities that have high ecological impact not be located within areas managed for conservation purposes.

2.5 Primary Industries

As outlined in the section on RLRPA, CAFNEC suggests that land use should accommodate small scale sustainable, diversified and organic agricultural enterprises and horticultural enterprises.

CAFNEC supports integrated agriculture and native forestry on rural properties, or *agroforestry*. CAFNEC does not support the harvesting of intact native forest, especially those without a recent history of major disturbance. Degradation of these existing natural forests are a major potential source of greenhouse gas emissions and must be considered wholly apart from forestry activities based on land already cleared, or highly degraded. Biodiversity impacts associated with the disturbance of intact forests must also be considered separately to activities on cleared or degraded land.

Priority must be given to agroforestry and carbon sequestration activities that enhance habitat and connectivity outcomes.

2.6 Extractive industries and mineral resources

CAFNEC agrees that Mareeba is well placed to service the mining industry to the west of the region. However we stress that all extractive industries must take all possible steps to prevent environmental damage and ensure that their practices are as energy efficient as possible.

Specific Amendments include

1. Consider a set of land use definitions for RLRPA rather than a strict 60 ha limitation.
2. Outdoor recreation that is incompatible with conservation be directed away from conservation areas, and provided with its own recreational precincts.
3. Remove reference to environmental offsets.
4. Encourage native forestry on private lands, which contributes to genetic and biological diversity of our region as well as sequesters carbon.
5. Any precinct in the RLRPA must gain the approval of the Department of Infrastructure and Planning and other relevant state government, and not be entirely up to local government's discretion.
6. Community input into precinct planning design and approval is of primary importance and the community must be given meaningful opportunities to deliberate over precincts, and reject them if necessary.
7. Add wildlife corridors to the list of values contained in FNQ's landscape.
8. Refer to ARCs cultural heritage mapping when developing a methodology to analyse landscape values.
9. An integrated system of statutory environmental overlays be implemented through the Plan, which are adopted into all planning schemes and protect regionally significant wildlife corridors, wetlands, areas of high ecological significance from any intensification of use, thus preserving their strategic conservation potential.

3. Strong Communities

Whilst CAFNEC recognises that the content of this section is important to the achievement of regional sustainability, the Plan is not detailed enough to provide sufficient guidance on implementing achievable outcomes. Therefore, we have not addressed many subsections in this section.

Strong community ownership of conservation issues needs to be recognised in this section. Unless there is a sense of involvement and some level of shared responsibility for the maintenance of the local natural and man made environs, it is unlikely that there will be a "strong community", especially in rural areas.

3.5 Sense of community, place and identity

The towns of Malanda, Kuranda and Yungaburra should be officially recognised for their local character, and made into heritage precincts.

3.5 Cultural heritage, arts and cultural development

The draft plan discusses these key building blocks for sustainable communities in generalities only. CAFNEC strongly believes that better planning and environment outcomes require pro-active and sustained community ownership and support to remain viable and relevant into the future. This means stepping beyond the silos of "planning", "environment" and "culture" and working towards a robust and holistic approach to the active management of positive human - environment interactions in the present and beyond.

Looking after important places and cultural heritage means more than protecting examples of the built environment reflecting more recent historic activities in the far north. Our region presents to the world a unique interface between the ancient and the new; it represents the present day manifestations of traditions, lore and resource use priorities implemented over many tens of thousands of years. To ensure ecological sustainability in the true sense, the Regional Plan must acknowledge, respect and refer to the varied and wide-ranging aspirations of this region's diverse communities but it must also effectively and pro-actively regulate the impacts that these aspirations will have on FNQ's special environments and species.

All objectives within the Regional Plan should explicitly support and reflect positive community cultural development which works towards strengthening positive collaborative relationships between Indigenous and non-Indigenous peoples; and across urban, regional and rural communities in the promotion and realisation of environmentally beneficial planning and development outcomes.

3.7 Indigenous local government areas

CAFNEC supports the desire of Traditional Owners and Indigenous communities to actively protect and manage Indigenous lands, waters and seas within the FNQ region for positive environmental outcomes. We acknowledge the significant external and internal pressures Aboriginal and other Indigenous communities continue to face in working towards a viable and sustainable future for their families, communities and peoples. We respect that both Wujul Wujul and Yarrabah communities need real opportunities to develop their own strategies for setting priorities for local land use and land management on Aboriginal held lands. We also acknowledge that this will require the informed decision-making of Elders, other Traditional Owners and relevant other Indigenous community members on a locally determined basis; and that an appropriate approach along these lines will take substantial community effort and time. We do not believe that consultations with Indigenous interests have been adequate to date. Regional planning affects Indigenous communities across the region, not just Indigenous local government.

The draft plan provides for a moratorium on FNQ 2025 statutory regulations with reference to the Aboriginal shires of Wujul Wujul and Yarrabah until such time as local planning schemes come into force under IPA. The clear deficiencies of the current IPA regime are discussed elsewhere, however CAFNEC calls on the Queensland Government to ensure both Wujul Wujul and Yarrabah Aboriginal shire councils are provided with appropriate levels of technical advice, resourcing and support to establish and implement robust planning schemes which can best protect the significant ecological values of lands, waters and seas in the Wujul Wujul and Yarrabah Aboriginal shires; and which reflect the important respective traditional and customary values attached to traditional Aboriginal lands, waters and seas within these local government areas.

CAFNEC expresses its concern that recent policy initiatives supported by state and commonwealth governments have the potential to further confuse opportunities for Aboriginal communities to best determine how they may wish to manage and utilise their lands and resources on a long-term sustainable basis. Land related policy mechanisms have been tied to specific social and financial incentives. Rather than fostering Indigenous cross community ownership of and investment in robust, tailored planning and environmental frameworks at the local level, the approach adopted is once again the top down imposition of a bewildering array of new requirements. CAFNEC is very concerned about the cumulative pressures being imposed on Aboriginal local governments to progress and finalise new local planning instruments and regimes within highly constrained timeframes and during an IPA review period. The FNQ 2025 Regional Plan should scope these challenges appropriately.

Specific Amendments include:

- The towns of Malanda, Kuranda and Yungaburra are officially recognised for their local character, and made into heritage precincts.
- Strong community ownership of conservation issues needs to be recognised in this section.

4. Urban Development

Key concerns with this section include:

- (a) The plan does not explain how it will foster distinctive, attractive communities with a strong sense of place.
- (b) The plan should preserve urban areas of high environmental significance, and outline areas for urban agriculture, and not leave it up to local planning authorities to have to enforce it.
- (c) The plan does not offer any strategies on how to encourage community and stakeholder collaboration in development decisions and leaves this up to local councils. Planning for sustainability should not only encourage but imply community participation. The Queensland Government, as it promotes the building of strong resilient and responsible communities, must acknowledge that a new planning approach is necessary and should have programs and funding for local government in place to achieve this.
- (d) A tropical and sustainable design standard for residential, commercial and public uses must be developed and applied for FNQ addressing climate appropriateness, reduction in greenhouse gases, character protection and sustainable use of natural resources must be made a priority.
- (e) 150 dwellings per ha in the inner city may not be conducive with community aspirations, existing character of Cairns or energy efficiency criteria.

4.1 Urban structure

- 4.1.1 CAFNEC supports the use of an urban footprint to contain urban growth.
- 4.1.2 Whilst climate change is significantly mentioned throughout the Draft Plan, a clear and decisive strategy is not provided. Thus the clause "*Development, transport and land use minimizes the region's contribution to climate change and ensures that industries, communities and the natural environment are resilient to the impacts of climate change*" is not substantiated. It is clear that the Draft plan will provide for higher density and more compact urban form than the current development paradigm, and provide transit options *to some extent*, however an appropriate response to climate change will require much more significant investment into public transport infrastructure than considered to date, and within a short term timeframe.
- 4.1.3 Appropriate sequencing is very important to develop appropriate management and infrastructure to cater for projected population growth, and also protect existing communities from disproportionate and rapid demographic and cultural change. CAFNEC considers the recent example of approval granted for a subdivision doubling the existing population of Yungaburra - a small town well known for its local character and heritage features - as a case of very poor sequencing for growth. The recent unsuccessful proposal to cater for 10,000 extra residents in Myola Valley was another illustration of poor sequencing. We trust such proposals will no longer be given consideration in Far North Queensland. The low density residential land on the Yungaburra Expansion area map (Eacham Shire) should be withdrawn (where permits have not already been issued) for this reason.

Mt Peter is a distant area from the current CBD of Cairns within the Cairns urban footprint. In reference to infrastructure, existing public transport and services, retrofitting and in-fill development closer to the CBD should be released and master planned and should have first priority when releasing land. Rather than further expansion on the Bruce Highway corridor CAFNEC supports a move to city (brownfield) infilling of ageing residential areas in the Edge Hill, Manunda, Mulgrave Road area with medium density multiple dwellings.

- 4.1.5 CAFNEC believes that the Draft Plan does not provide enough protection to areas of environmental significance, although it has taken some positive steps towards protecting scenic amenity. CAFNEC proposes that a systems of statutory environmental overlays protecting wildlife corridors, riparian zones, wetlands and significant remnant vegetation are used both within and outside of the urban footprint, to ensure that areas of environmental significance within urban areas are not lost, and planning schemes are made to reflect and enforce these overlays.
- 4.1.6 The densities indicated in this clause are appropriate for urban and residential areas, but should be achieved as an average through a diverse range of housing stock, and not homogenous suburban blocks.

4.2 Regional activity centres

- 4.2.1 CAFNEC supports the intent that urban development and associated services be clustered around existing activity centres (as highlighted in Map 10) however we reinforce the importance of having a public transport hub in each of these regional centres and that the centres be “retrofitted” around New Urbanist principles to improve their liveability and pedestrian orientation.

It is highly doubtful that the principal regional activity centre desired densities of 150 dwellings/hectare (high rise in the CBD) conform to the desired regional outcome of discrete, sustainable urban centres and fostering distinct communities. Existing high rises, in Cairns and other cities are far from being sustainable buildings and do not comply with the Cairns tropical style design guide. They are generic and could be found in any city. The same applies for major regional centres where density should be aligned with the existing identity and form of the area.

Type 1: High-density multi unit dwellings as an area of exclusively high-density high-rise does not comply with the overall desired regional outcome of this section for the following reasons, as these:

- destroy the existing character and identity of the city
- impede the mountain- sea connection
- are likely to create social problems related to over crowding
- have limited or no community approval.
- are notoriously energy intensive and almost always rely on air conditioning.

4. CAFNEC supports this clause, and hopes that the regional plan will preclude the development of any further car dependant out of town retail parks and warehouse type-shopping complexes along highways, like Mulgrave Rd.

4.3 Urban form and master planning

- 4.3.1 New development should also encourage pedestrian orientation through sound ecological urban design principles.

- 4.3.2 CAFNEC supports higher densities around activity centres, but stresses that lower density residential areas should provide a range of housing choice. For higher density activity centres to be successful with high levels of amenity they must encourage active transport (foot and bicycle) and “life on the street”. The best way to achieve this is to create significant areas that are car-free. Steps should also be taken to limit car-parking facilities available around activity centres to encourage other low energy transit modes. Densities of 40 dwellings per ha are better achieved through townhouses and terraces, than by apartment blocks with little opportunity for natural ventilation.
- 4.3.3 CAFNEC supports the principles of a structure plan and master plans, with input from all relevant State departments, however it is of paramount importance that the community is given adequate support and opportunities to genuinely direct the form and structure of any master planned community, and that this is factored into project timelines and budgets. Master planned communities must also take every measure to ensure that they are energy and resource efficient, designed appropriately to the site and have minimum impact on the surrounding environment.
- i. In transit oriented communities, public transport infrastructure and services must be provided in a supply led fashion and every step must be incorporated to encourage well designed walking and cycling opportunities.

4.4 Housing mix and affordability

The introduction to this section states, “to achieve a mix of housing choice and ensure housing affordability, all new Greenfield and redevelopment projects should ensure the provision of retention of a minimum level of affordable housing to cater for both the entry buyer and low income housing market”, and later...” all new Greenfield and redevelopment projects should consider the retention and provision of a minimum level of affordable housing”. This will not be achieved unless strict quotas and requirements are placed on property developers. The word *should* is too weak in this context.

4.4.1 The timeframes for the supply of residential land are appropriate.

4. It is critical that we move away from the suburban model of single use zones with homogenous housing stock, which is purpose built for nuclear families, proven to be a shrinking sector of the demographic make up of our community. CAFNEC has consistently and strongly refuted claims from Housing Industry groups that the solution to housing affordability is in releasing land at the urban fringe. We maintain that the answer to housing affordability is to provide mixed dwelling types in higher densities close to amenities.

4.5 Urban character and design

Whilst CAFNEC fully supports the principles espoused in the Draft Plan in relation to tropical and climate appropriate design, and resource efficiency, we are dismayed by the lack of mechanisms provided to achieve clear outcomes.

An opportunity to apply the principles and design elements espoused under this section will within the master planning and structure planning stage, particularly in reference to adequate and accessible high quality open space.

CAFNEC purports that, by preserving and maintaining natural areas, such as river corridors and wetlands they can be integrated into urban areas so that they can

enhance the quality of life and the amenity of the city. They naturally provide breaks and variations to the built environment. Therefore, protecting remnant vegetation and riparian and wildlife corridors within the urban footprint will achieve many of the outcomes sought from land use policies from section 4.5 (4.5.1; 4.5.4; 4.5.5; 4.5.7).

The Draft Plan should encourage the re-establishment of neighbourhood (block) shops within easy walking distance of most residences. The critical walking distance (which determines whether or not people will walk or use their car) is 400m- 800m (5-10 minutes). Such shops could be part of a small block retail grouping, or stand-alone.

4.5.1 New urban developments must do more than just *encourage* sustainable use of natural resources.

- i. Farmland for urban agriculture and open space for community gardens should also be identified and protected.

Explanatory notes:

Reference is made to developing flexible performance based mechanisms which protect, manage and enhance cultural diversity, urban character and encourage innovation in urban design. The performance-based system enshrined by the *Integrated Planning Act 1997* has been notoriously unsuccessful at achieving these sort of outcomes, and a performance based system can not be relied upon in the regional plan.

4.6 Rural residential development

4.6.1 CAFNEC supports the Draft Plan's policy on limiting rural residential land to the existing stock of appropriately zoned land. Whilst rural residential can have some positive aspects, for accommodating hobby farms and small scale horticultural industries, and providing a low impact land use for buffer zones adjacent to protected estate, it has many negative impacts, mostly entrenching low commuting distances into urban form. Therefore CAFNEC supports the premise that existing stocks of rural residential land in Far North Queensland is adequate and that further land within the RLRPA should not be released for this purpose.

However, CAFNEC is deeply concerned about the exemption within the associate document Statutory Provisions, which allows a two year window for new development applications in areas zoned rural residential outside the Draft plan's urban footprint and rural living area. These areas include the Mission Beach coastal living area, areas in the Silkwood hinterland, Japponvale and Mena Creek valleys adjacent to the Wet Tropics World Heritage Area and large parts of Myola valley - areas well known for their outstanding ecological values. This exemption should be removed.

- 4. CAFNEC supports locating services in existing cleared areas and the co location of service corridors, but suggests that '*minimises*' be strengthened to '*ensures no loss*'.

4.7 Mitigation of hazards

4.7.1 Obviously every measure must be investigated and adopted to avoid exposure of the community to natural hazards. Low lying coastal areas must be spared from further development for this reason, as should swamp land, floodplains and riparian corridors and natural drainage lines. Another reason that dwellings should not be situated high on hill slopes is because it greatly increases their exposure to bush fire. Recent development approvals granted within the region actively undermine the effective mitigation of such hazards,

in particular where such developments are immediately adjacent to coastal rivers, estuaries and beaches. These hazards are exacerbated by the challenges of catastrophic or dangerous climate change.

- 4.7.2 CAFNEC considers that existing population pressures from residential development on the coast are too acute, and we do not support any new development in coastal centres or areas.
- 4.7.5 CAFNEC greatly supports the retreat from areas that should never have been granted development permits in the first place due to their exposure to natural hazards, including hill slopes, estuarine zones and the coast. However, we require more information about how this provision will be made. The highest level priority in this respect is to withdraw development approval from False Cape, and provide for re-stabilisation and rehabilitation of this site. Further, Ella Bay Integrated Resort Development and a number of marina developments proposed for the Johnstone River should not be allowed to proceed in this specific respect.
- 1 Hazardous and high impact industries should be discouraged within our region and where they do operate already, every step should be taken to mitigate their impacts on the surrounding community and environment.

Specific Amendments include

1. The “Low density residential land on the Yungaburra Expansion area map (Eacham Shire) should be withdrawn where ever possible (where permits have not already been issued) for this reason.
2. Removal from Urban footprint of Lot 66 in Mission Beach
3. Inner city infill areas are released for urban consolidation and master planning before the Mt Peter development is embarked upon.
4. Farmland for urban agriculture and open space for community gardens be identified and protected.
5. Wildlife corridors, riparian zones, wetlands and areas of high ecological significance in urban areas are protected by the Regional Plan through statutory environmental overlays, not simply deferred to local government planning schemes.
6. That the densities of 150 dwellings are reviewed in terms of existing character, community acceptance and energy efficiency before being adopted.
7. Commitment to developing a tropical design standard.
8. Withdrawal of development approval from False Cape for safety reasons, and re-stabilisation and rehabilitation of this site initiated.
9. Remove two year window for new development applications on rural residential zoned areas outside the urban footprint and rural living area

5. Economic Development

In a peak oil scenario, we may witness a drastic drop in tourism as the economic base for the region. Mineral extraction is also highly dependant on fossil fuels, so this may also lead to a reduction in these activities in the region. CAFNEC suggests that the Draft Plan vastly under estimates the need for alternative transit modes from the private vehicle to support the regional economy in a post peak oil world.

5.1 Economic growth and diversification

Whilst CAFNEC fully appreciates the value of economic diversification on an appropriate and ecologically sustainable footing, arguably the most important aspect of diversification from a sustainability perspective is localisation. In the context of peak oil

and the need to lower our greenhouse gas emissions, the process of economic localisation is of utmost importance. It will also be of extreme strategic importance in the event of any economic downturn or recession, which is probable in the wake of peak oil. The regional plan, and any future economic regional plans should take every step to encourage the localisation and self-reliance of our regional economy, especially in relation to food.

- Job creation should be maximised in existing town and neighbourhood centres, and employment opportunities should be spread evenly and proportionately across activity centres throughout the region, so as not to create advantaged and disadvantaged areas.

5.16 CAFNEC strongly supports self-containment of regional centres, as this will ensure that average commuting distances to work via residents are lessened and that local economies are insulated against the economic impacts of peak oil. Neighbourhood centres as well as activity centres should have some allowance for employment creation.

5.2 Industry and business development

5.2.1 Future mining and extractive industries have already been identified, mapped and protected from conflicting uses, and a State Planning Policy has been developed to ensure this. CAFNEC believes that sites of renewable energy generation potential should receive the same treatment, as wind, solar and geo thermal energy will be a critical part of the solution to climate change and important strategic sites in the future.

5.2.2 In the context of peak oil, aviation services may be of much lesser status than that which they currently occupy.

5.2.4 CAFNEC fully supports this clause, and feels that new businesses, light industry and home based businesses should be encouraged in smaller village hubs and neighbourhood centres. Where possible employment opportunities should be integrated into residential areas, to provide for more residents the opportunity of living within walking distances of their homes.

5.3 Innovation and technology

5.3.1 A major failing of planning practice to date is that it has allowed the location of educational and research facilities in suburban or rural locations, remote from any activity centre (e.g. James Cook University, Smithfield). Universities and colleges could be a catalyst for vitalising activity centres and public precincts and any future facilities of this sort must be appropriately located to achieve this catalytic role.

5.4 Primary Industries

As described earlier, CAFNEC's concern with this section is that only primary production that is broad scale, energy intensive and highly mechanised monocultures are considered. Very little consideration or provision has been made for small scale, low impact, diversified agriculture and horticultural enterprises within the RLRPA. These however will be of prime importance in creating local food economies and developing self-reliance in essential foodstuffs, especially in the context of peak oil.

Agriculture will be impacted on by peak oil both for machinery and transport. Therefore it is imperative that the plan support local market-oriented mixed farming in areas like Japoonvale, Mena Creek, Rumula, Julatten, Mareeba and Kairi and other localities with basaltic soils to service the regional market.

5.5 Tourist Development

In the context of peak oil, we cannot expect that tourism will provide a significant future employment base for the region. Therefore, the tourism sector may account for a lesser portion of the regional economy over the next few decades.

5.5.1 CAFNEC fully supports the exclusion of integrated resort developments from the RLRPA. CAFNEC recommends the development proposal for Ella Bay will be rejected for this reason, under the auspices of FNQ 2025.

5.5.2 CAFNEC supports the permission of small scale, low impact, nature based tourist facilities in the RLRPA. However, we are concerned that there seems to be no provision for preventing the cumulative impacts of a large numbers of such facilities all clustered in the same area. CAFNEC sees this a clear loophole that must be addressed in the final plan.

5.5.2.b CAFNEC supports that no tourist enterprise or facility should be located within areas of high ecological significance and commends the use of unambiguous language to deliver this point.

5.5.2.c The rehabilitation of connectivity or habitat could be a permit condition for any small tourist development within the RLRPA, particularly those adjacent to protected areas.

- See comment for section 2.2

In the explanatory notes, it is indicated that a small-scale tourist accommodation facility has a maximum of 20 units to house 100 people on no more than 1000 square metres. Whilst CAFNEC is very sympathetic to the need to limit the scale of tourist facilities in the RLRPA, this area is only an average house block size and therefore unrealistic.

Specific Amendments include

1. Small scale agriculture, and horticultural industries must be supported in the RLRPA.
2. Provision is made for preventing the cumulative impacts of a large numbers of small-scale tourist facilities all clustered in the same area.
3. Rehabilitation of connectivity or habitat could be a permit condition for any small tourist development within the RLRPA, particularly those adjacent to protected areas.
4. Review the size limits of small-scale tourist facilities in the RLRPA.
5. Map and protect sites with renewable energy generation potential.
6. Strongly encourage economic localisation.

6. Infrastructure

6.1 Infrastructure, planning and coordination

- 6.1.2 CAFNEC fully supports strong and decisive demand management in infrastructure planning, especially in energy, water and transport infrastructure provision.
- 6.1.3 CAFNEC once again stresses the importance of protecting key sites for the generation of renewable sites, which should, where necessary be proactively acquired.

6.2 Infrastructure funding

A schedule and budget for State infrastructure commitments would be greatly beneficial if the community is to make an informed judgement on the efficacy and commitment of FNQ 2025 as a planning strategy. In many ways, the infrastructure investment into the region as a result of FNQ 2025 is more important than the plan itself.

Budget allocations must be made for implementation and especially enforcement of this plan at the local government level.

6.3 Energy

All councils must have a strategic plan and target for reducing their energy use.

A critical issue which is not addressed in the document is the source of electric power, which at present comes from Townsville (which is itself experiencing power supply issues), some from Koobaloomba, Lake Tinaroo with Barron River hydro acting as a load balancing system (plus some input from Windy Hill, Ravenshoe). There is a need to move away from reliance on coal based power from central Queensland, and to renewable energy sources from within our region.

Consideration should be given to a mini-grid for commercial properties in Cape Tribulation, and a reactivation of the Daintree Renewable Energy grant for residential properties. The village centres of Cow Bay and Cape Tribulation are totally dependant on diesel generators, the greenhouse contribution of these would be disproportionately huge.

- Viable renewable energy source generation should not just be recognised as a legitimate land use, but extensive studies should be undertaken to determine the sites for renewable energy facilities and these sites must be protected.

6.4 Waste

Large areas of our region (e.g. the former Mareeba shire and the former Johnstone shire) currently do not have access to recycling facilities - neither kerbside collection nor deposit points. It is mentioned that only 5 of 10 regional councils have kerbside recycling, and size and remoteness is given as a reason, however recycling depots in towns and centres would still be viable. The lack of any such facility is a major short-coming in our region's waste management system and must be addressed.

6.5 Information communication technology

Specific Amendments include

- Consideration should be given to a mini-grid for commercial properties in Cape Tribulation, and a reactivation of the Daintree Renewable Energy grant for residential properties.
- Budget allocations must be made for implementation and especially enforcement of this plan at the local government level.
- Studies should be undertaken to determine the appropriate locations for renewable energy facilities with state 'protection' of these sites into the future.
- Recycling depots should be made available in every town centre.
- The following must be set for adoption by each local council within the region and be included in the FNQ2025 as additional Land Use Policies:
 - 6.3 – Energy efficiency targets and minimum efficiency requirements for new buildings and renovations.
 - 6.3.5 – Baseline minimum energy efficiency and reporting targets.

7. Water Management

CAFNEC rejects the assumption that new water supply needs to be secured for an increasing population, and instead claims that water conservation and efficiency measures will be sufficient to meet demand into the future.

7.1 Water quality

Developing or clearing native vegetation within a waterway, wetland and riparian area and floodplain should more than be avoided, but must be prohibited. Furthermore, currently cleared and degraded riparian areas should be rehabilitated, potentially through a system of tradable development rights. Residential areas and housing estates that have been poorly located in areas should pursue a policy of "strategic retreat". Preserving the natural state of these areas has many environmental benefits- it preserves water quality, creates wildlife corridors and precincts, provides outdoor recreation, links urban residents to the natural environment and creates a buffer for flood times and storm surge events, and protects the health of the reef and marine ecosystems and fisheries- that the natural qualities of these important areas should not be undermined under any circumstances.

- i. Given the economic importance of the Great Barrier Reef, and our regions annual monsoon events and very high rainfall, this clause is of utmost importance.

Water quality improvement plans, like that which was prepared for the Douglas Shire, should be prepared for every council territory in the region, and backed up with an implementation schedule. Terrain NRM may assist in preparing these, with regionally relevant expertise in this area.

CAFNEC supports the targets for water quality outlined in this section.

Riparian zones perform services for water filtration and for maintaining the health of local and regional biodiversity. Therefore, the zones should be given mandatory set-back distances (see amendments).

7. Total water cycle

7.3 Water planning

CAFNEC opposes several key recommendations in the FNQ Water supply strategy, which the Draft Plan refers to. Nullinga Dam is an unnecessary, costly and unsustainable project which would negatively impact on the intact Walsh River system. Furthermore, the Tully Millstream hydro proposal should be scrapped permanently and more sustainable energy sources should be investigated, which do not have such detrimental ecological impacts.

In short, every possible measure towards resource efficiency and water conservation must be made before securing new water supplies via dams.

CAFNEC suggests that every new master planned community and housing estate within infill and Greenfield areas should invest in large underground water storage facilities, which collect storm water from each house, and direct it back into grounds and appliances. Grey water infrastructure can be collected in the same way, and used in toilets and to irrigate the grounds. If done on a scale of an entire community, water storage and re-use can be more economical than new dams.

All council areas must have strategic plans for reducing water usage.

7.4 Water demand management

We stress the importance of demand management, particularly in Far North Queensland where there is a perception that water is limitless. Our tourism sector is also a large water consumer, often using large quantities of water in a wasteful manner. There has also been a demographic trend noted for “rain changers”- i.e. people migrating from drought stricken southern regions because of the lack of water restrictions in Far North Queensland. Given all these factors, a local and Queensland Government combined education initiative would be very timely and useful to counter these attitudes and behaviours in our region.

Increasing water costs is a very effective policy instrument, with appropriate rebates for financially constrained consumers.

7.5 Water Supply

- ii. CAFNEC does not support the protection of future catchment and storage areas as indicated by the FNQ Regional Water Supply Strategy.

- 7.5.A CAFNEC does not support desalination in its present form, as it is very energy intensive and costly- this money is better spent on water conservation measures.

7.6 Rural water

The Queensland Government should curtail wasteful irrigation practices.

Specific amendments include

1. Water quality improvement plans, like that prepared for the Douglas Shire, should be prepared for every council jurisdiction in the region, and backed up with an implementation schedule.
2. Every new master planned communities and housing estate within infill and Greenfield areas should invest in large underground water storage facilities, which collect storm water from each house, and direct it back into grounds and appliances.
 1. The set-back distances for Riparian Zone widths within urban areas in the Explanatory Notes in 7.1 be adopted as a minimum standards and included in the statutory provisions, and or/ referred to in an amended 7.1.1.

2. An additional Riparian Zones map should be produced at a scale appropriate to make decisions at a 'lot' scale (i.e. at least 1:50,000).

8. Transport

Implicit in the introductory section is that vehicle transport usage in Cairns area will continue to grow- 73% over current rates by 2036, a business as usual scenario. This is contrary to a peak oil scenario and the likelihood of an economic downturn in the next ten years.

8.1 Integrated transport and land use planning

- 8.1.2 CAFNEC strongly supports the development of a network of transit-oriented communities, as indicated in Map 15. However, we feel that Kuranda, being a significant centre with many residents who commute daily to Cairns, should be included in this network. Also the sequencing of the development of this network is critical. The entire network must be undertaken within the next 5 years, if we are to reduce our greenhouse gas emissions, and prepare Cairns residents for peak oil, which is eminent. Whilst in a business as usual scenario, this proposal would be considered unrealistic, in the current situation, where fuel costs are already rising sharply and the trend is sure to continue indefinitely, provision of quality public transport is absolutely crucial. Therefore the 10-15 year timeframes suggested earlier in the plan, are completely unacceptable.

Furthermore, CAFNEC is very disappointed no consideration is given to applying the transit-oriented principles to regional centres outside Cairns. The reason stated is that a critical population mass does not yet exist, however these calculations are made on the premise of 10% of trips made by public transport. In the near future, due to the rising cost of fuel, we may be dealing with 40% and beyond of trips made by public and active transport. Therefore the Queensland Government must respond quickly and comprehensively to cater for the uptake in a huge spike in demand for these services.

- 8.1.2 Proposals for new roads should be discontinued, and the money should instead be diverted into upgrading public transport services, which is of extreme strategic importance.
- 8.1.3 Targets should be developed for reducing regional Total Vehicle Kilometres and indicators to this end should be measured and analysed continually to monitor the efficacy of the Draft Plan's integrated transport and land use planning strategies and policy mechanisms.
- 8.1.5 Bicycle facilities, such as lanes, racks and showers are below standard in Cairns, and every measure should be taken to address this. Also, city councils should consider a "free bike" service, which has proven to be very successful in other countries.
- 8.1.7 Modal connectivity is the most important aspect of transport planning and will largely determine the success of any transport strategy.
- 8.1.9 Complementary industries should be co-located *along rail freight corridors* to minimise transport requirements and increase resilience to potential impacts of peak oil.

8.2 Transport networks

In master planned and structure planned communities, CAFNEC suggests that if housing estate design does not conform to suggested principles, that the Department of Infrastructure and Planning must require that it is be redesigned to align with them.

Many relatively minor upgrades to the existing bicycle land and path networks in Cairns would greatly improve their safety and utility. The community group Cairns Bicycle users group (CBug) have highlighted many of these discrepancies in the existing network, all of which are outlined on their website. CAFNEC recommends that the Queensland Government and the Cairns Regional Council adopt some recommendations from the outstanding work that this group has collated, to create a better, safer bicycle network for Cairns.

8.3 Transport Infrastructure

8.3.1 CAFNEC is a strong proponent of the retention and protection of the existing rail network in Far North Queensland. The practice of the Queensland Government of tearing up tracks and selling rail corridor reserves was extremely short sighted and economically irresponsible. All remaining rail corridor reserves must be protected, whether they are used in the near term or not. Furthermore, strategic extensions of the existing rail network should be protected from development, as these may well be of critical economic importance in a post peak oil regional scenario.

- CAFNEC is concerned about the blue arrow on Map 17a indicating a “future improvement for B-Doubles” between Cairns and Mareeba. This seems to indicate a commitment by the Queensland Government to fund the Kuranda range four-lane highway, which is contrary to the Draft Plan.

CAFNEC suggests that bypasses should not be funded, as a retreat from energy intensive forms of transport is required. Maintenance of existing roads is necessary, but costly new roads, major upgrades and bypasses constitute unnecessary expenditure. Targeted investment will be required for upgrading inadequate public transport and rail freight networks.

- CAFNEC supports the proposal for a rapid speed bus way and a light passenger rail using cane rail corridors. The strategic importance of these should be preserved.

8.4 Sub regional Transport

Bus and rail links in between regional centres must be given much higher importance in the regional plan. A rail link between Cairns and the Tablelands should be investigated with a full feasibility study as this option is an economically and environmentally sustainable option.

Specific Amendments include:

- 1.
2. Section 8.1 - Remove the 15 story, 150 dwellings per hectare model proposed for TOC Type 1 (Table 9 Transit oriented communities—typology for Cairns) as it will have limited application for the region. Other high density options, that retain the characteristic ocean to hill vista, should also be canvassed through public consultation.
3. Section 8.4 – Create a timetable for the funding and establishment of a regional public transport coordination authority within three years is recommended.
4. Section 8.4 - Public transport targets should be raised significantly to a level that would reflect a 40% public transport usage by 2025, with an aim for a capacity of 60% public transport usage in this timeframe.

5. Upgrading of existing railway to double track and possible electrification, from Mareeba to Innisfail, with a very significant increase in both passenger and freight services along that corridor.
6. The Kuranda Range four-lane highway proposal should be permanently abandoned.
7. A rail link between Cairns and the Tablelands should be investigating with a full feasibility study, as an alternative to the four lane highway up the Kuranda Range
8. The targets for trips by public transport and bicycle be increased in light of probabilities of skyrocketing fuel costs and these targets are applied to other centres in the region also.
9. All funding for road upgrades and bypasses be diverted to upgrading public transport.
10. All remaining rail corridor reserves must be protected.
11. The Queensland Government and the Cairns Regional Council adopt some recommendations from the outstanding work on bicycle pathways from CBUG to create a better, safer bicycle network for Cairns.
12. Targets for trips by public transport and bicycle are increased and applied to all regional centres.
13. The full transit oriented communities/ transport corridor for Cairns be implemented within the next 5 year period.

PART F: Implementation, monitoring and review

CAFNEC insists that the minimum mandatory review period should be 5 years, not 10 years, and this review should allow for full community consultation and input.

Compensation rights for extinguishing existing development rights should be limited.

Sunset clauses should be introduced for old, unused development permits, especially those which contradict the intent of the Regional Plan (see Regulatory Provision Amendments).

There are several policy models that are highly suitable for adoption into the regional plan that have not been adopted.

These policy models include:

1. Sustainability indicators (drawing on current indicator models from State of the Region and State of the Environment reporting systems),
2. Integrated habitat network.

Although these models, which offer positive outcomes in terms of regional sustainability, are not ready for adoption they will be within a five-year period. The work being undertaken by CSIRO Tropical Landscapes, Terrain NRM Ltd, and the University of Queensland, supported by the federal government's MTSRF (Marine and Tropical Science Research Facility) could be applied through the regional plan within five years. Therefore it is imperative that the review process of the regional plan accommodate for this.

Furthermore, Sustainability Indicators can be instrumental to effective implementation, review and monitoring itself, making the regional plan a more sophisticated and adaptive policy. Whilst targets, indicators and data sets are sporadically mentioned throughout the Draft Plan, no formal system of monitoring regional sustainability is referred to. Most monitoring efforts committed to by the Department of Infrastructure and Planning seem to be directed to land availability for future development, rather than on the sustainability outcomes desired by the Plan.

CAFNEC is interested in the Regional Planning Implementation Group, comprised of managers from state and local government and representatives from non-government organisations. CAFNEC hopes to be informed of their progress, and that there will be scope for conservation sector involvement in their activities.

Infrastructure planning and budgets will be the real test of the commitment of the Regional Plan. CAFNEC strongly recommends that the highest-level commitment for infrastructure allocations be the development of a mass-transit system for Cairns.

CAFNEC is concerned that there is over-emphasis on the Regional Coordination Committee to guide the regional plan, as in reality their contact time is very limited, and as such they are not an adequate conduit for the community into the process.

Specific Amendments include:

1. A review of the plan should occur no less than every five years. In conducting such a review, extensive community consultation should occur at a standard at least as high as that set out in Schedule 1 of the *Integrated Planning Act 1997* (Qld) ("Process for making or amending planning schemes"); this minimum community consultation requirement should be clearly spelt out in the "Community involvement in implementation" section.
2. A biennial review of the status of the region should be produced by the DIP, in cooperation with the regional councils.
3. The 2025 Regional Plan should contain a set of suggested Sustainability Indicators, Targets and Thresholds which are monitored continuously and which trigger decisive intervention and remedial action when breached. Though such indicators are currently not well described, the requirement for the monitoring of performance in all Regional Policy areas should be included as a Land Use Policy in each section. Examples of key Sustainability Indicators include: wildlife corridors connectivity index, acreage of remnant vegetation, protected area loss/gain, carbon footprint, local species extinctions, water consumption, recycling levels, etc.

Amendments to State Planning Regulatory Provisions (Regional Plans)

CAFNEC fully supports the amendments proposed by the Environmental Defenders Office of North Queensland (attached), and also makes mention of the points below :

1. Generally broaden the application of the Regional Plan by amending Division 1 of the State Planning Regulatory Provisions (Regional Plans) (“the Regulations”).
2. Limit the exceptions to the application of the FNQ2025 in Division 1 of the Regulations:
 - a) Extinguish current Impact Assessable and Code Assessable Development Approvals and Preliminary Approvals which are two or more years old if the works authorised by the relevant approval(s) have not yet been substantially commenced.
 - b) Extinguish current Impact Assessable and Code Assessable Development Approvals and Preliminary Approvals in two years’ time if works authorised by the relevant approval(s) are not substantially commenced within that time.
 - c) Automatically condition all future Development Approvals and Preliminary Approvals to require holders of those approvals to make all reasonable efforts to substantially commence works authorised by the relevant approval(s) as soon as possible, and in any event within two years of the relevant Approval(s) being issued.
3. Remove any rights of property owners and approval holders to claim compensation for the lapsing of Development Approvals or Preliminary Approvals in the circumstances set out in paragraphs (a) and (b) of Submission 2 above.
4. Limit all and any other compensation claims that property owners and/or approval holders may have to claim compensation for any other reason as a result of the implementation or operation of the FNQ2025 Regional Plan.
5. Expand on the type of development applications which require Impact Assessment, to include any application for Development Approval or Preliminary Approval in respect of land which:
 - a) is within:
 - i. 200 metres from Areas of High Ecological Significance; or
 - ii. 100 metres from Areas of General Ecological Significance; or
 - b) is within:
 - i. 50 metres of each high bank of a waterway of stream order 5 or greater; or;
 - ii. (25 metres of each high bank of a waterway of stream order between one and four; or
 - c) is contained (either entirely or partially) within land which is covered by any overlays or overlay codes in local government planning schemes which deal with (either wholly or partially):
 - i. Bushfire Risk and/or Management;
 - ii. Cultural Heritage Significance;
 - iii. Flood Risk and/or Management;
 - iv. Hillslope conservation, protection, amenity and/or safety;
 - v. Acid Sulphate Soil Material (potential or actual);
 - vi. Vegetation conservation, protection and/or amenity; or
 - vii. Waterway significance, conservation, protection and/or amenity.
6. For Code Assessable development applications, restrict the circumstances in which local governments may approve development applications which conflict

with codes in planning schemes after the introduction of the FNQ2025.

7. For Impact Assessable development applications, restrict the circumstances in which local governments may:
 - a) Approve development applications which would compromise the achievement of the Desired Environmental Outcomes;
 - b) Approve development applications which would be in conflict with the planning scheme.

END