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Submission

North Queensland Conservation Council (NQCC) appreciates the opportunity to comment on the Townsville State Development Area (TSDA) draft. The 4,900 ha site covers a Nationally Significant Wetland and is in the proximity of important ecological areas including world heritage and Ramsar sites.

About NQCC

NQCC is a peak organisation in the state-wide environmental movement and the voice for the environment in North Queensland. Established in 1974, NQCC is a not-for-profit incorporated association with a broad mandate to endeavour to protect the “land, waters and atmosphere of the region” and since then has worked continuously on a number of environmental issues of significance for North Queensland and beyond.

NQCC’s Feedback on the Draft TSDA

NQCC’s feedback is detailed below with comments about precincts, offsets, assessment criteria and consultation, to name a few. NQCC welcomes any follow-up resulting from the queries raised in this submission.

TSDA Section

NQCC’s Comments

Strategic
Vision

NQCC wishes to positively acknowledge the following:

- the Draft TSDA has included an additional point: (e) recognise and protect environmental, cultural and community values. What is unclear, is how these values would be ‘recognised’ and ‘protected’ and whether this applies across all the different precincts.
- In the draft, (f) has been carried over from the current TSDA relating to maintaining Outstanding Universal Value of the GBRWHA.

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Overall

Objectives

Objective (f) in relation to the offsets, reads as though additional offset areas could to be added to the 1,637ha of EMP under the draft TSDA and this would be welcomed by NQCC in the interests of expanding environmental value in a sensitive wetland environment. To elaborate further, this would facilitate further environmental values (including those identified over time with better access to information) within the 6 other precincts can be offset.

NQCC would like to see the return of the wording in (h) in particular Matters of National Significance and OUV of the GBRWHA.

Environmental

Management

Precinct

Increased area and/or multiple functions

NQCC gratefully acknowledges the Department for the increased area added to the draft TSDA Environmental Management Precinct (EMP) from the current TSDA's equivalent TSDA. This is in part due to greater consultation with DES to identify wetlands, essential habitat and remnant vegetation. Another reason for the increase is due to other functions being incorporated in the one precinct such as flood mitigation, cultural heritage and offsets.

Maintain the separation of Offsets Precinct from Environmental Precinct

The draft TSDA has sought to simplify the precincts however NQCC holds the view that it is more appropriate to keep Ecological Corridors and priority Offsets Precinct separate from the EMP. The offsets need to be defined as 'no go' areas preserved for environmental values as a compromise for the loss of environmental values resulting from the TSDA. Offsets must clearly define what area and values are being offset and the resulting area have to be managed accordingly forever (and not used for any other purpose). For further clarification, NQCC would like to know (a) if these are offsets under the Offsets Policy or if the TSDA has 'borrowed' the concept for the TSDA precincts; (b) what is specifically being offset within the TSDA. NQCC assumes that these offsets incorporated in the EMP does not prevent further offsets by proponents who submit development applications for within the TSDA area. This is especially important if the availability of information improved i.e. in relation to shorebirds using sites within the TSDA.

Reinstate the Offsets Precinct

NQCC would like to see greater certainty articulated in the TSDA where offsets are concerned as a 'preferred development intent' would be inconsistent. If they are offsets then there is no flexibility about the use of that land other than for biodiversity conservation. Therefore, the Offsets precinct should be worded as 'they are areas to remain development free due to their offset environmental values.'

Strengthen the purpose of the EMP

Similarly, the environmental management precinct in the draft TSDA is said to 'remain development free' and yet the wording 'precinct development intent' suggests a lack of certainty of the protection of these areas for biodiversity

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conservation. The terminology of 'development intent' may be appropriate for the Industrial and infrastructure precincts to avoid constraining development within rigidly defined precincts. However, the need for EMP areas is to be given greater is part of achieving the strategic vision and overall objectives of the draft TSDA. It is also problematic that the EMP 'development intent' incorporates multiple functions that are not likely to be compatible with biodiversity conservation such as environmental facility or park; permanent plantation; and utility installation.

Plantations that are consistent with environmental outcomes

NQCC would also like the TSDA to provide clarity about the term 'permanent plantation.' It should be stated that the 'permanent plantation is to be consistent with environmental management outcomes.' The intended outcomes of biodiversity conservation can drastically differ from intended outcomes of carbon sequestration plantations (e.g. choice of species and mixed-species versus mono-culture plantings).

Rehabilitation is a welcome addition to the draft

NQCC appreciates that the EMP in the draft TSDA mentions providing 'opportunities for rehabilitation and enhancement of existing environmental values.' It is however requested that the draft TSDA have the following wording from the current TSDA added 'recognises and protects wetlands, vegetation and fauna habitats closely related to the Great Barrier Reef Marine Park, Great Barrier Reef World Heritage Area and Bowling Green Bay Ramsar site, and associated catchment.'

Primary Purpose of EMP is biodiversity

NQCC suggests that the EMP primary purpose needs to be identified and stated in certain terms (rather than an intended or suggested use) that it is to 'protect environmental values, including wetlands, vegetation and fauna habitats closely related to the Great Barrier Reef World Heritage Area and associated catchment.'

Flood works that are consistent with biodiversity

NQCC would like to understand the types of developments that 2.4.7 (iii) refers to i.e. 'flood immunity to developable areas and allow flood mitigation works where sympathetic to environmental values.' It is a concern that protecting assets of the Industrial area will become the primary purpose and that flood mitigation works within the EMP will result in diminished environmental values. NQCC suggests wording change of 2.4.7. (iii) to 'flood immunity to developable areas and allow flood mitigation works that are consistent with maintaining environmental values.'

Clarity about other outcomes for EMP

NQCC would like to see the extra outcomes within the EMP be mentioned as subordinate considerations to biodiversity conservation. The TSDA is about how to allow and support development that is consistent with the purpose of each precinct. In the case of EMP, the purpose of this precinct (and a suggested

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additional Offsets Precinct) is for environmental protection and for the area to remain 'development free' (draft TSDA 2.4.7 (a)).

Wetlands and Bowling Green Bay

NQCC recommends the wording from the current TSDA be added to the EMP section of the draft TSDA, specifically 'recognises and protects wetlands, vegetation and fauna habitats closely related to the Great Barrier Reef Marine Park, Great Barrier Reef World Heritage Area and Bowling Green Bay Ramsar site, and associated catchment' (from the Environmental Conservation Precinct).

Resources
precinct

Environmental values of Muntalunga Ranges

NQCC would suggest that there are likely to be locally significant environmental values within the Muntalunga Ranges that are not adequately captured within state government's information systems. This needs further input from local experts and possibly additional faunal surveys. NQCC would like to help with this. The main concern is that areas of higher elevation will become increasingly important due to climate change as a refuge for species seeking out cooler areas.

Assessment
Criteria

Emissions

NQCC notes there is no mention of waste reduction and recycling that is currently in the TSDA.

Natural Hazards

This section has rightfully been expanded given better knowledge about climate change impacts and particularly to a site that is a wetland.

Water Quality

NQCC believes that the draft TSDA has not adequately captured what is in the current TSDA, such as:

(21) Development is managed such that the quality of surface water, groundwater, or water with the potential to enter the Great Barrier Reef World Heritage Area, is enhanced

(22) Development protects the environmental values of surface waters and groundwaters by: reducing potential adverse impacts on water quality; preventing direct or indirect discharge of contaminants to surface or groundwater bodies; managing stormwater runoff; providing adequate treatment and distribution infrastructure; providing on-site disposal and treatment; managing dangerous and/or hazardous substances

(23) Development protects the ecological and hydraulic function of waterway corridors in the TSD

Environment, Cultural Heritage and Community

NQCC recommends including wording from current SDA to 'include the identification of local, regional, state and national values where relevant' and include in offsets section 'development impacts must be offset in accordance with current best practice'.

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Landscaping

NQCC notes that the draft TSDA has carried over the use of at least 50% local species. One suggested addition is that additional plantations or plantation placement be considered to reduce the heat island effect of the TSDA.

Application
stage

NQCC would like to these phrases transferred over to the draft:

10.2 (7) (b) 'relevant referral entities informing them of the decision, including the reasons for the decision' (from the TSDA)

10.4: (3) 'If public notification is required, the proponent must: (a) publish a notice at least once in a newspaper circulating generally in the locality of the TSDA'

10.6 (3) 'The Coordinator-General will assess the application having regard to: (a) the application and any additional information provided; (b) an EIS and EIS evaluation report, if relevant; (c) any referral entity submissions or submissions'

Definitions

NQCC supports the important distinction here between appreciation, conservation and interpretation as distinct from uses mentioned in (b) below:

'Environmental facility means the use of premises for: (a) a facility for the appreciation, conservation or interpretation of an area of cultural, environmental or heritage value but (b) does not include the use of premises to provide accommodation for tourists and travellers.'

Additional
Comments

Reef 2050

It is essential that all efforts have been made for the draft TSDA to incorporate priorities within the Reef 2050 plan for the protection of the GBRWHA. This is an important issue for the region, for the TSDA site for its close proximity to the world heritage site and for NQCC.

Nationally Significant Wetland

NQCC is aware that the entire site of the TSDA is covered by a Nationally Significant Wetland as part of MNES. It is a concern that a wetland has been the chosen site for significant development and it also highlights that the identification of important ecological features has not prevented this area from being the site of intensive development.

Shorebird Data

NQCC has obtained some information that perhaps data collected by the Queensland Waders Study Group (QWSG) has not been used to inform Queensland Government decision-making. The Department of Transport and Main Roads are working with QWSG to fill in this gap of knowledge. NQCC requests that the TSDA team look into this as part of this draft TSDA process. Also, local experts have indicated a lack of information where there are likely to

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be significant ecological biodiversity values. These sites include the southern bank of the Ross River and adjoining intertidal flats to the south and possibly (as previously mentioned) Muntalunga Ranges.

In conclusion, NQCC aims in this submission to ensure that environmental conservation is adequately provided for within the TSDA. It is essential that every level of government and the various departments give careful consideration for the environment in all aspects of their work. Declining species diversity and declining water quality within the GBRWHA are just two very important reasons out of a list of many more that NQCC provide feedback in submissions such as this process as part of the TSDA in order to strength protections of the natural values of the site.