

## **North Queensland Regional Plan** **NQCC Submission**

North Queensland Conservation Council (NQCC) appreciates the opportunity to comment on the Draft North Queensland Regional Plan August 2019 from the State Development, Manufacturing, Infrastructure and Planning Department (referred to in this submission as the Plan).

### **Who we are**

North Queensland Conservation Council (NQCC) is a peak organisation for the region and is part of a network of statewide conservation councils. Established in 1974, NQCC is a not-for-profit incorporated association with a broad mandate to protect the “land, waters and atmosphere of the region” and since then has worked on a number of environmental issues of significance to North Queensland and beyond. NQCC covers an area along the coast from Bowen in the South, North to Cardwell and inland to Mt Isa, through to the Northern Territory border. We are the voice for the environment and represent over 1500 members and supporters.

### **The North Queensland Vision – Reducing the Region’s Carbon Footprint**

The vision for North Queensland needs to include more of an explicit commitment to reduce the region’s greenhouse gas emissions. The North Queensland Regional Plan can incorporate emissions reductions more thoroughly by implementing suggested changes mentioned throughout this submission.

The existing draft of the Plan has rightfully made mention of the need to assist communities to manage climate change impacts, utilising ecosystems as buffers and regular updates of climate modelling (page 69, NQ Regional Plan). NQCC supports the inclusion in the Plan of ‘climate change adaptation Strategies to reduce climate change effects at a regional level have also been addressed under other regional goals including: (a) ensuring urban development patterns decrease reliance on private transport and thereby reduce greenhouse gas emissions; (b) incorporating affordable renewable energy options, low emissions technology and energy efficiency measures into buildings, communities and transport options; (c) improving the viability and resilience of natural assets, to help them better cope with climate changes and act as buffers to nearby communities’ (page 69, NQ Regional Plan).

The draft Priority Living Areas (PLA) included in the Plan and the mapping should articulate in more detail how the above strategies will be addressed ‘to reduce climate change effects at a regional level’ and how urban sprawl with high dependence of fossil-fuel based transport can be reduced.

## **A Vision of an Ecologically Sustainable North Queensland**

Ecologically Sustainable Development (ESD) needs to be incorporated in the Plan to ensure we protect the natural environment - one of the most important aspects of the region. The natural environment is very important for North Queenslanders who enjoy the outdoor lifestyle, fresh air, unique natural landscapes, the Great Barrier Reef and National Parks. (ESD). ESD is about integrating considerations of the economy, society, culture, the natural environment and equity into decision-making processes.

Australia has committed to the implementation of ESD through the National Strategy for Ecologically Sustainable Development (1992) which defines ESD as: 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.'

Over the next 25 years, North Queensland needs ESD to be the highest priority to ensure a healthy society and natural environment. On this basis NQCC supports the "proposed amendment of the Regional Planning Interests Regulation 2014 ... so that 'mining resource activities' are identified as an unacceptable use in the North Queensland Strategic Environmental Areas (designated precinct)' (page 66, Draft NQ Regional Plan) known as SEAs.

The Plan acknowledges that 'SEAs contain regionally significant attributes for biodiversity, water catchments, and ecological function and connection. Management of these areas is to maintain the natural ecosystem functionality of their environmental attributes to ensure the region's significant biodiversity and ecological integrity is upheld' (page 188, draft NQ Regional Plan). NQCC would support the expansion of SEA (designated precinct) areas as a way of including ESD in the Plan.

In addition, the Plan should reference the guiding principles within the National Strategy for ESD:

- decision making processes should effectively integrate both long and short-term economic, environmental, social and equity considerations
- where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation
- the global dimension of environmental impacts of actions and policies should be recognised and considered
- the need to develop a strong, growing and diversified economy which can enhance the capacity for environmental protection should be recognised
- the need to maintain and enhance international competitiveness in an environmentally sound manner should be recognised
- cost effective and flexible policy instruments should be adopted, such as improved valuation, pricing and incentive mechanisms
- decisions and actions should provide for broad community involvement on issues which affect them

## **The Townsville State Development Area**

NQCC's position on the Townsville State Development Area (TSDA) is that it not an appropriate location for low to high density industrial activity. The TSDA is a 4,900 ha site that covers a Nationally Significant Wetland, includes areas that are important for many species including shorebirds and is in close proximity of important ecological areas including world heritage and Ramsar sites. The site is a large, low-lying area which includes watercourses that drain straight into the Great Barrier Reef World Heritage Area where impacts on water quality are of great concern.

## **Local Government Area Statistics Tables**

NQCC would like to see LGA summary tables on pages 21-25 of the Plan distinguish between natural environment features and natural resource features. It is important to distinguish these two. The natural environment features are acknowledging significant values that may be based on their aesthetic value and/or their biodiversity value and ecosystem function. The natural resource features focus on the key landscape values that have an economic use value.

Appendix 1 includes proposed changes to the LGA summary tables based on input from NQCC and our members, providing a more representative list of key values under the relevant heading. We also make a specific request that throughout the Plan, the 'Reef' or the 'Great Barrier Reef' be referred to in full as the 'Great Barrier Reef World Heritage Area' or GBRWHA.

We would like to see the addition of a "Natural Environment Features" heading that lists some of the key features. The full list is provided in Appendix 1 with a summary of suggested additions below:

### ***Townsville City Council***

- Town Common Conservation Park
- Clement State Forest
- Cleveland Bay
- Southern Black-throated Finch – key habitat in the Townsville region
- Mahogany Glider – key habitat in the Townsville region
- Great Barrier Reef World Heritage Area
- Magnetic Island National Park
- Ramsar listed Bowling Green Bay wetlands
- Beach and wetlands near the Port of Townsville
- Cungulla Wetlands

### ***Burdekin Shire Council***

- Inkerman Hill
- Collinsons Lagoon
- Wongaloo Wetlands<sup>1</sup> - a regional park near Bowling Green Bay National Park
- Burdekin Delta nationally important wetland
- Barratta Creek

### ***Hinchinbrook Shire Council***

- Girringun National Park (including Wallaman Falls)
- Paluma Range National Park (Jourama Falls)
- Key habitat for Mahogany Gliders
- Broadwater, Abergowrie State Forest

### ***Charters Towers Regional Council***

- Lake Buchanan nationally important wetland
- The Great Basalt Wall National Park
- The Valley of Lagoons
- Burdekin River including Charters Towers boat ramp and weir area;
- White mountain National Park incorporating the Burra Burra Range

## **Additional Feedback from NQCC Members**

### ***1. A Regional Vision that matches up with Community Aspirations***

- **Addressing extinction and climate crises** - The plan makes no or little mention of the current extinction crisis or a climate crisis and tremendous need to protect habitat areas, much of which is on private land. The plan needs to offer a realistic direction for 'our climate change future.'
- **Clear direction for climate change** - The Plan needs to offer realistic directions for our climate change future which includes recognising the need for North Queensland to cut greenhouse gas emissions. The most recent Qld State of Environment Statement (latest data 2016) shows thermal electricity generation

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<sup>1</sup> Dept. Environment and Science 2015, *Wongaloo Wetlands*, DES, viewed 13 November 2019, <

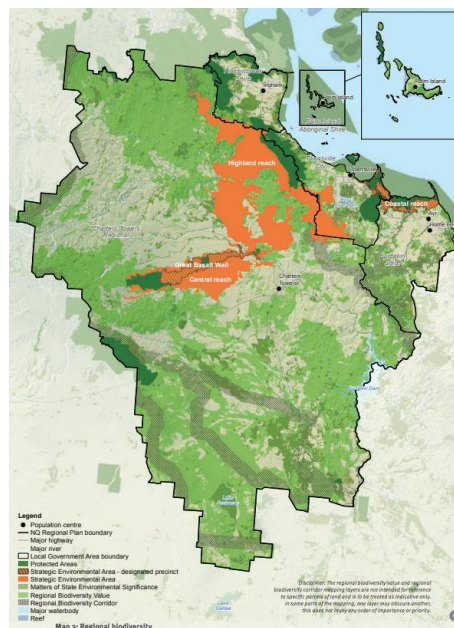
<https://parks.des.qld.gov.au/managing/plans-strategies/statements/pdf/wongaloo.pdf>>.

- contributed 48% of the State's CO2 emissions. Other major sources included transport, industrial gas leaks ('fugitive emissions') and agriculture (farm animals).
- **Strategies for managing disasters better** - The need for managing future disasters that will need to rely less on transport that contributes to greenhouse emissions and that strategies are more sophisticated than stocking more sandbags.
- **Regional Plan that regenerates and expands environmental values** - the natural environment - The Plan needs to help develop strategies to increase environmental values of the North Queensland region.
- **The addition of 'carbon footprint'** - The statement under the goal 'A leading economy in regional Australia' should read as 'To position the North Queensland region as a leading regional economy over the next 25 years by capitalising on its diverse industry base and numerous competitive advantages *while containing and reducing our carbon footprint.* Similarly, under renewable energy on page 51 of the Plan, the regional outcome 1.4 should read as 'Make the North Queensland region a national leader for renewable energy production, storage and ancillary technologies, *driven by the need to cut the region's carbon footprint.*'
- **Suggested Goal wording change** - The statement under the goal 'A rich and healthy environment' should read as 'To protect and sustainably manage the region's natural assets, and the ecological processes that support them, to maintain a unique *natural* environment *and pursue carbon sequestration opportunities that benefits biodiversity conservation while containing and reducing our carbon footprint.*'
- **Resilience needed for a warming World** - The goal 'Liveable, sustainable and resilient communities that promote tropical living at its best' contains some good guidelines, but the Plan could go further into the town planning and building code changes needed for resilience in a warming world.

## 2. Key Environmental Values and Strategic Environmental Areas (SEAs)

- **Protecting 30% of the landscape for the natural environment** - Until 30% of the land area that comes under the North Queensland Regional Plan becomes Protected Area for Environmental Values we have not met the triple bottom line of environmental, social, and economic security, i.e. 30% of the area within Map 1 (p.6).
- **No Mining in National Parks** – The Plan to mention that mining is still automatically precluded from National Parks and therefore the SEA precincts can include National Park areas.
- **Achieving preservation of Biodiversity Values and Landscape Connectivity** - The Regional Biodiversity map on page 67 of the Plan may need land revoked or purchased by the state to achieve the preservation of biodiversity values and landscape connectivity.

- **Protecting habitat areas** - All areas of essential habitat of threatened species should be striped as Strategic Environmental Areas (SEAs) as well as areas of threatened ecosystems including the coastal beach scrub on state land and the TCC nature reserve at Ollera Creek.
- **Protect Corridors and Riparian Vegetation** - SEA protection should be extended to the proposed biodiversity corridors and the riparian zones of all significant watercourses (i.e. a minimum of 50-100 metres beyond the high bank of any watercourse with catchment areas greater than 50 hectares) to achieve water quality objectives for the Great Barrier Reef World Heritage Area<sup>2</sup>.



*Map: Regional Biodiversity map  
(page 67 of the Plan)*

### **3. Renewable Energy Investigation Areas (REIAs)**

- **Should not impinge on Environmental Values** - The expansion of renewable energy developments must not impinge on environmental areas and therefore the REIAs needs to not overlay areas of high biodiversity values.
- **REIAs are best located on Marginal Lands** - Similarly, REIAs are best on marginal, previously cleared farming country in Lower Herbert and Lower Burdekin Districts.
- **REIAs makes no mention of Transmission** - There is no mention in the Plan regarding transmission corridors to connect the REIAs.

<sup>2</sup> D.Schwartz 2015, *Aline of dump trucks from Perth to Sydney and back again*: How sediment is killing the Great Barrier Reef, Abc News, viewed 13 November 2019, <<https://www.abc.net.au/news/2015-11-23/unsoiling-the-great-barrier-reef/6963598>>.

- **REIAs over Black-throated Finch Habitat** - The suggestion that REIAs on the coastal plain should be removed (south of Townsville and south of Ayr/Home Hill) as they are known Black Throated Finch population areas,
- **Not all Biofuel production is Sustainable** - Ethanol should not be included as a potential future biofuel since it's not a sustainable industry and it can lead to deforestation. Lifecycle analyses show that too much energy is put into growing biofuels unless they are grown on marginal croplands using minimal water and fertiliser, or uses plant-waste materials<sup>3</sup>.

#### **4. Additional Comments**

- **More detailed maps within the Plan document** - The maps within the Plan should include more landmarks and property lines to make it easier to get a bearing.
- **Native Title and Indigenous Aspirations** - Ensuring that the Regional Plan acknowledges Native Title applications, Traditional Owners and the aspirations of Indigenous peoples of North Queensland.

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<sup>3</sup> Abraham, J 2018, *Biofuels can help solve climate change, especially with a carbon tax*, The Guardian, viewed 13 November 2019, < <https://www.theguardian.com/environment/climate-consensus-97-per-cent/2018/mar/14/biofuels-can-help-solve-climate-change-especially-with-a-carbon-tax>>.

## Appendices

### Appendix 1

**Table: North Queensland Today Section, pp. 21-25 Summary Tables of LGAs**  
*Suggestion: Add in “Environmental Values” and “Natural Resource Features” (green is our additions, purple is original wording from the Plan)*

<u>TOWNSVILLE CITY COUNCIL</u>
<p><b>Environmental Values</b></p> <p>Town Common Conservation Park– a significant site for birds including migratory species</p> <p>Cleveland Bay marine environment (forms part of the GBRWHA)</p> <p>Key habitat of Southern Black-throated Finch is located within the Townsville area (Threatened Species in Qld and Federally), see map in Appendix 4</p> <p>Great Barrier Reef World Heritage Area</p> <p>Magnetic Island National Park</p> <p>Ramsar listed Bowling Green Bay wetlands</p> <p>Beach area near the Port of Townsville (see Appendix 2 for map and Appendix 3 for species list)</p>
<u>BURDEKIN SHIRE COUNCIL</u>
<p><b>Environmental Values</b></p> <ul style="list-style-type: none"> <li>• Inkerman Hill</li> <li>• Collinsons Lagoon</li> <li>• Wongaloo Wetlands</li> <li>• Burdekin Delta nationally important wetland</li> <li>• Barratta Creek</li> </ul>
<u>HINCHINBROOK SHIRE COUNCIL</u>
<p><b>Environmental Values</b></p> <p>Girringun National Park (including Wallaman Falls)</p> <p>Paluma Range National Park (Jourama Falls)</p> <p>Key habitat for Mahogany Gliders</p>
<u>CHARTERS TOWERS REGIONAL COUNCIL</u>
<p><b>Environmental Values</b></p> <p>Lake Buchanan nationally important wetland</p> <p>The Great Basalt Wall National Park (falls &amp; lakes)</p>



Appendix 2

**Beach near Townsville Port – Natural Environment Feature of Townsville LGA**



Appendix 3

Under the heading of Townsville City Council area, the beach area beside the Townsville Port includes mudflats at low tide which are feeding grounds for a large variety of shorebirds as well as mangroves providing food and shelter for other birds. The mudflats at low tide are feeding grounds for a large variety of shorebirds as well as the mangroves providing food and shelter for other birds which specifically make mangroves their habitat. An NQCC member surveys the birdlife at this site most days. Here are the species that are observed regularly at the site:

**Shorebirds**

- **Eastern Curlew (Endangered in Qld)** - There are two there most days. It was observed these did not migrate this year, preferring to hang around in Townsville.
- **Beach Stone-curlews (Vulnerable in Qld)**
- **Bar-tailed Godwits** - small shorebirds that fly 10,000 km to get from the Tundras of Siberia to this site. Having travelled so far, they need this site to be healthy to regain their body weight to be in good health for their next migration.
- **Little Terns** - these birds use the sandbar on the other side of the channel as a breeding ground.

- **Whimbrels**
- **Common Greenshanks** - Despite the name, they are not common.
- **Red-capped Plovers**
- **Egrets** - the Little Egret, Intermediate Egret and the Great Egret
- **Striated Heron** - a shy, easily spooked bird. Relatively uncommon.
- **Red-necked Stints**
- **Gull-billed Terns**
- **Caspian Terns**
- **White-faced Heron**
- **Royal Spoonbills**
- **Black-necked Storks**
- **Grey-tailed Tattlers**

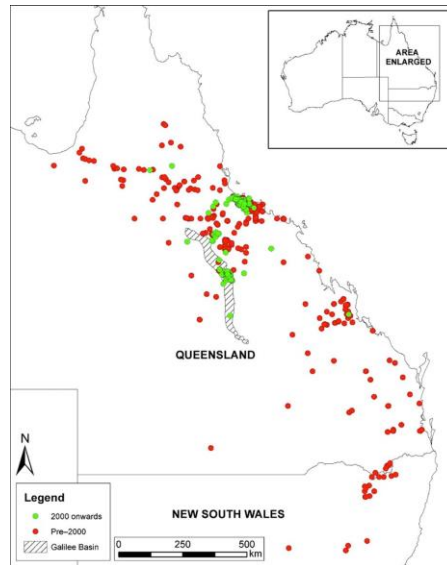
Bird species that need to mangroves at the site:

- **Brown Honeyeater**
- **Brown-backed Honeyeater**
- **Mangrove Honeyeater**
- **Varied Honeyeater**
- **Great Bowerbird**
- **Mistletoebird**
- **Blue-faced Honeyeater**
- **Dusky Honeyeater**
- **Yellow Honeyeater**
- **Mangrove Gerygone**
- **Large-billed Gerygone**

Birds of Prey that rely on local supply of fish for their food:

- **Whistling Kites**
- **Brahminy Kites**
- **Eastern Osprey**
- **White-bellied Sea Eagle**
- **Black-shouldered Kite**

Appendix 4



Vanderduys et al

<https://images.theconversation.com/files/113499/original/image-20160302-25897-3nqszi.jpg?ixlib=rb-1.1.0&q=45&auto=format&w=1000&fit=clip>

*This map shows key habitat of Southern Black-throated Finch within the Townsville area and across the state (Threatened Species in Qld and Federally).*