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The Hon. Jarrod Bleijie MP

Deputy Premier, Minister for State Development, Infrastructure and Planning and Minister for Industrial Relations

Queensland Government

Sent by email: FNQRPSubmissions@dndip.qld.gov.au

RE: Submission regarding Draft Far North Queensland Regional Plan 2025

INTRODUCTION

Cairns and Far North Environment Centre (CAFNEC) welcomes the opportunity to make a submission on the Draft Far North Queensland Regional Plan 2025.

CAFNEC is the peak regional environment organisation for Far North Queensland and has been advocating for the protection of the region's natural environment, climate resilience and community wellbeing for more than four decades. We represent and support a network of local conservation and community groups across the region, and work closely with Traditional Owners, scientists, local governments and community stakeholders to ensure positive outcomes in land use planning, biodiversity protection, climate adaptation and sustainable development.

Far North Queensland is globally significant for its natural and cultural values. The region contains two World Heritage Areas, the Great Barrier Reef and the Wet Tropics of Queensland, as well as highly biodiverse rivers, wetlands, forests, coastal systems and cultural landscapes that underpin the region's economy, identity and liveability. These values are already under severe and increasing pressure from climate change, land use change and habitat fragmentation.

As a statutory regional plan, the Draft FNQ Regional Plan 2025 will have long-term influence over land use planning, infrastructure investment and development assessment across the region. It will shape decisions that determine whether Far North Queensland's biodiversity, landscapes and communities are protected and strengthened, or whether existing pressures and risks are compounded over the next 20 years.

CAFNEC's submission focuses on the parts of the Draft Plan that are most critical to determining whether the Plan delivers meaningful environmental protection, climate resilience and long-term sustainability. Accordingly, this submission provides detailed comments and recommendations on:

- Theme 3: Ecotourism and Biodiversity
- Theme 4: Healthy and Liveable Communities
- Chapter 5: Delivery

Our recommendations seek to strengthen the Draft Plan by clarifying priorities, embedding avoidance-based and precautionary planning principles, and ensuring that the Plan is grounded in the current condition and trajectory of the region's environment and communities.

CAFNEC acknowledges the Traditional Custodians of the lands and waters on which we live, work and gather, and we pay our respects to Elders past and present.

We recognise that Aboriginal and Torres Strait Islander peoples are the first custodians, carers, scientists and conservationists of this continent, with deep, enduring knowledge systems that have sustained Country for tens of thousands of years. Our work is strengthened by First Nations knowledge, leadership and ongoing connection to Country, and we are committed to listening, learning and working in partnership to protect and care for Far North Queensland's lands, waters and communities.

RESPONSE TO CHAPTER 4: POLICY OUTCOMES AND STRATEGIES

Theme 3: Ecotourism and Biodiversity

CAFNEC strongly supports the intent of the Draft FNQ Regional Plan 2025 to recognise and protect Far North Queensland's globally significant biodiversity, landscapes and natural systems as the foundation of the region's environmental, cultural and economic wellbeing.

Far North Queensland is internationally recognised for its extraordinary biodiversity and landscape values, including the Great Barrier Reef and the Wet Tropics of Queensland World Heritage Areas, as well as extensive networks of rivers, wetlands, forests, coastal ecosystems and cultural landscapes¹. These values are already under significant pressure from climate change, land use change and habitat fragmentation². Land use planning under this theme therefore plays a decisive role in whether the region's biodiversity and landscapes are stabilised and restored, or continue on a trajectory of decline.

This theme is central to whether the Regional Plan provides sufficient direction to halt and reverse biodiversity loss, strengthen ecological connectivity and climate resilience, and ensure that development and land use change over the next 20 years deliver net environmental benefits rather than incremental environmental harm⁴.

The comments below focus on strengthening this theme to ensure it is grounded in the current status and trajectory of regional biodiversity, explicitly addresses climate change as a driver of environmental decline, and provides clear, measurable direction for land use planning decisions.

Policy Outcome 1: Ecotourism

CONTEXT & GROUNDS

CAFNEC strongly supports the intent of Policy Outcome 1 and agrees that ecotourism is a core pillar of Far North Queensland's economy, regional identity and international reputation.

¹ UNESCO. World Heritage List: Wet Tropics of Queensland, 2024, Section 2.

² CSIRO. Climate Change Impacts on Queensland Biodiversity, 2022, Ch. 3.

Protecting the natural environment as the foundation of the tourism sector is both an environmental and an economic imperative.

As a statutory regional plan, the FNQ Regional Plan plays a key role in shaping where and how tourism development occurs, how tourism interacts with sensitive environments, and whether cumulative impacts are avoided or exacerbated over time. Clear regional direction is therefore essential to ensure tourism development remains genuinely low-impact, climate-resilient and aligned with conservation and cultural values.

KEY ISSUE

While Policy Outcome 1 appropriately emphasises protection of the natural environment and the importance of ecotourism, several Strategies rely on broad intent without sufficient safeguards to prevent incremental environmental degradation or inappropriate tourism development in sensitive locations.

In particular, clearer guidance is needed to:

- ensure ecotourism development demonstrably protects and enhances environmental values rather than merely minimising impacts,
- avoid conflating “tourism” with “ecotourism”, and
- ensure cultural tourism and First Nations tourism are led by, and deliver benefits for, First Nations peoples rather than being retrofitted into development proposals.

The strategy-by-strategy comments below focus on strengthening Policy Outcome 1 so that tourism growth reinforces, rather than erodes, the natural and cultural values that underpin FNQ’s tourism sector.

Strategy 1.1 Support FNQ as a world-class tourism destination including by:

a. protecting the natural environment as a pillar of FNQ’s tourism sector and brand.

b. accelerating and diversifying ecotourism to complement the iconic assets of the GBR, Wet Tropics and Einasleigh bioregion.

c. identifying, promoting and supporting additional cultural tourism experiences...

CAFNEC strongly supports the explicit recognition of environmental protection as a pillar of FNQ’s tourism sector and brand, and the intent to diversify ecotourism beyond the region’s most iconic assets.

However, Strategy 1.1 would benefit from clearer guidance on how environmental protection is prioritised when tourism development pressures arise, and how “ecotourism” is distinguished from general tourism development that may still generate significant impacts.

In addition, while support for cultural tourism is welcomed, the Strategy does not clearly articulate expectations around First Nations leadership, consent and benefit-sharing.¹³

Recommendation 1.1(a) Strengthen Strategy 1.1(a) by clarifying that protection of the natural environment is a primary consideration in tourism land use planning, and that avoidance of impacts on high-value ecosystems is the preferred planning response.

Recommendation 1.1(b) Clarify that ecotourism development must demonstrate a clear net benefit to environmental outcomes, not simply reduced impacts compared to conventional tourism development.

Recommendation 1.1(c) Strengthen Strategy 1.1(c) to prioritise First Nations-led and co-designed cultural tourism experiences, with early engagement and ongoing involvement of Traditional Owners in planning and decision-making.

Strategy 1.2 Identify and protect nature-based tourism routes and destinations that support low impact development while protecting ecological values and access to natural assets.

CAFNEC supports the identification and protection of nature-based tourism routes and destinations, and the recognition that low-impact development is essential in these locations.

However, without clearer criteria and mapping, there is a risk that increased promotion of tourism routes and destinations may inadvertently increase pressure on sensitive environments or lead to incremental intensification over time.

Recommendation 1.2(a) Strengthen Strategy 1.2 by requiring clear identification and mapping of nature-based tourism routes and destinations, informed by ecological values, carrying capacity and climate vulnerability.

Recommendation 1.2(b) Clarify that protection of ecological values is the primary objective of this Strategy, and that tourism development within these routes and destinations should be limited to genuinely low-impact uses.

Recommendation 1.2(c) Require cumulative impacts of tourism development along routes and at destinations to be considered at a regional scale, rather than assessed on a project-by-project basis.

Strategy 1.3 Integrate tourism land use planning by ensuring accommodation supply and transport access near key attractions.

CAFNEC supports better integration of accommodation, transport and tourism planning to reduce car dependence and improve visitor experience.

However, locating accommodation supply near key attractions carries inherent risks if not carefully managed, particularly where attractions are located in or adjacent to environmentally sensitive areas.

Recommendation 1.3(a) Clarify that proximity to key attractions should not override environmental constraints, and that accommodation development should be avoided in areas of high environmental value or climate risk.

Recommendation 1.3(b) Strengthen Strategy 1.3 by prioritising accommodation and transport integration in existing centres and previously disturbed areas, rather than encouraging new development footprints near sensitive natural assets.

Recommendation 1.3(c) Require tourism-related transport and accommodation planning to explicitly consider climate resilience, including flood risk, extreme heat and long-term viability of access routes.

Policy Outcome 2: Regional Water Quality

CONTEXT & GROUNDS

CAFNEC strongly supports Policy Outcome 2 and considers it fundamental to the long-term environmental, cultural and economic wellbeing of Far North Queensland. Water quality underpins the health of the Great Barrier Reef, coastal wetlands, estuaries, rivers and groundwater systems, as well as the viability of tourism, fisheries, agriculture and community water supplies.

As a statutory regional plan, the FNQ Regional Plan has a critical role in guiding land use planning and development in a way that prevents further degradation of water quality and supports catchment-scale improvement over time. This is particularly important given projected population growth, land use change and the increasing impacts of climate change on rainfall intensity, erosion and pollutant transport.

KEY ISSUE

While Policy Outcome 2 appropriately recognises the importance of protecting water quality, the Draft Plan does not consistently translate this intent into strong, enforceable land use planning direction. In particular, clearer requirements are needed to ensure that:

- water quality protection is prioritised in land use and development decisions, rather than treated as a secondary consideration,
- catchment-scale and cumulative impacts are addressed, not just site-level effects, and
- planning decisions actively support improvement in water quality outcomes over time, rather than merely minimising further decline.

The strategy-by-strategy comments below focus on strengthening the Draft Plan's ability to deliver measurable water quality protection and improvement across FNQ catchments and the Great Barrier Reef lagoon.

Strategy 2.1 Adopt best practice water management approaches in urban, rural and natural areas of FNQ to enhance and protect the health and ecological functions of waterways, wetlands, estuaries and waters of the Great Barrier Reef lagoon.

CAFNEC supports the intent of Strategy 2.1 and the application of best practice water management across all land use contexts, including urban, rural and natural areas.

However, the Strategy would benefit from clearer articulation of what constitutes “best practice” in a planning context, and how these approaches are to be embedded consistently across local planning schemes and development assessment processes.

Recommendation 2.1(a) Strengthen Strategy 2.1 by requiring local planning schemes to embed best practice water-sensitive planning and design principles as assessable requirements, rather than discretionary considerations.

Recommendation 2.1(b) Clarify that best practice water management must account for projected climate change impacts, including increased rainfall intensity, erosion risk and pollutant mobilisation.

Recommendation 2.1(c) Prioritise protection and restoration of riparian zones, wetlands and floodplains as critical water quality and ecological assets within land use planning.

Strategy 2.2 Support integrated catchment management through nature-based solutions that improve natural hazard resilience, erosion control and water quality of the catchment and the Great Barrier Reef.

CAFNEC strongly supports the emphasis on integrated catchment management and the use of nature-based solutions, which deliver co-benefits for water quality, biodiversity, climate resilience and community wellbeing.

This Strategy aligns closely with established catchment management approaches in FNQ and the role of restoration, rehabilitation and landscape-scale planning in improving downstream water quality outcomes.

However, the Strategy does not clearly articulate how land use planning will actively support and prioritise these solutions, particularly in areas identified for growth or infrastructure expansion.

Recommendation 2.2(a) Strengthen Strategy 2.2 by explicitly linking integrated catchment management to land use planning decisions, including the identification of priority areas for nature-based solutions within planning schemes.

Recommendation 2.2(b) Clarify that nature-based solutions, such as wetland restoration, riparian rehabilitation and floodplain reconnection, should be prioritised in areas contributing disproportionately to sediment, nutrient and pollutant loads.

Recommendation 2.2(c) Encourage coordination between land use planning, catchment management programs and restoration initiatives to maximise cumulative water quality benefits at a regional scale.

Strategy 2.3 Ensure planning and development decisions support the protection of environmental values and meet or exceed water quality objectives for regional surface water, groundwater, wetlands and the Great Barrier Reef outlined in the Environmental Protection (Water and Wetland Biodiversity) Policy 2019.

CAFNEC supports the explicit linkage to the Environmental Protection (Water and Wetland Biodiversity) Policy 2019 and the requirement to meet or exceed established water quality objectives.

However, without stronger direction, there is a risk that compliance with water quality objectives is treated as a downstream regulatory issue rather than a core consideration shaping land use and development decisions upfront.

Recommendation 2.3(a) Strengthen Strategy 2.3 by requiring that land use planning and development decisions demonstrate how proposed outcomes will meet or exceed applicable water quality objectives at both site and catchment scales.

Recommendation 2.3(b) Clarify that where there is uncertainty or risk of cumulative impacts, a precautionary approach should be applied, prioritising avoidance of development that may compromise water quality.

Recommendation 2.3(c) Require consideration of cumulative and long-term impacts on water quality, particularly in catchments draining to the Great Barrier Reef lagoon.

Policy Outcome 3: Regional Landscapes and Biodiversity

CONTEXT & GROUNDS

CAFNEC supports the intent of Policy Outcome 3, and considers it central to protecting Far North Queensland's globally significant landscapes, biodiversity and cultural values while enabling sustainable land use over the long term.

Far North Queensland's regional landscapes underpin biodiversity conservation, cultural identity, ecosystem services, food production, tourism and climate resilience. Land use planning decisions that fragment landscapes, erode ecological connectivity or incrementally degrade natural values can result in irreversible impacts, particularly in the context of climate change.

As a statutory regional plan, the FNQ Regional Plan must provide strong, clear and future-focused direction to protect landscape integrity, support long-term land stewardship and ensure development and land use change do not undermine the ecological systems on which the region depends.

KEY ISSUES

The Draft Plan does not clearly articulate the baseline condition and trajectory of regional biodiversity and ecosystems, nor does it clearly recognise climate change as a driver of biodiversity decline. This omission weakens the Plan's ability to prioritise land use outcomes that halt and reverse biodiversity loss and to measure whether the Plan is achieving meaningful improvements by 2046. For example:

- Queensland as a whole has a very high threatened species burden, with 1,034 threatened species listed under the Nature Conservation Act 1992.
- The Wet Tropics has very high biodiversity significance and documented climate risk, with UNESCO identifying climate change as an emerging threat to integrity and predicting substantial range decline for endemic vertebrates under projected warming.
- Commonwealth "Priority Places" for the Eastern Forests of Far North Queensland note more than 130 threatened species in the area.
- GBRMPA Outlook Report 2024 describes how Reef health and ecosystem processes are under escalating pressure from climate change.

Without stating this baseline and trend, Policy Outcome 3 risks reading as a set of neutral land use preferences rather than an urgent, measurable plan to change a declining trajectory.

Additionally, while Policy Outcome 3 contains many strong elements, several Strategies rely on broad intent without sufficiently clear thresholds, avoidance-based direction or mechanisms to address cumulative impacts and long-term landscape change.

In particular, stronger safeguards are needed to:

- prevent incremental fragmentation of regional landscapes and biodiversity networks,
- ensure SRAs and biodiversity corridors are protected and strengthened rather than gradually eroded, and
- clearly prioritise long-term ecological function and landscape integrity over short-term land use pressures.

The strategy-by-strategy comments below focus on strengthening Policy Outcome 3 so that it delivers durable, climate-resilient landscape and biodiversity outcomes across FNQ.

Strategy 3.1 Identify FNQ's natural values, natural resources, cultural heritage and outdoor recreation values in land use planning.

CAFNEC supports the intent of Strategy 3.1 and the recognition of the region's diverse natural, cultural and recreational values.

However, identification alone is insufficient unless these values meaningfully influence land use outcomes and development decisions.

Recommendation 3.1(a) Amend 3.1 to require a Regional Biodiversity Baseline (summarising, at minimum, the number and distribution of threatened species and threatened ecological communities; condition and trend of key ecosystems; and key pressures and trajectories) to give decision makers a key "starting line" and a basis for planning responses.

Recommendation 3.1(a) Strengthen Strategy 3.1 by clarifying that identified natural, cultural and recreational values must actively inform land use zoning, development assessment and infrastructure siting decisions.

Recommendation 3.1(b) Require that identification of values and mapping be informed by the best available science, Traditional Owner knowledge and regional datasets, and incorporate climate projections relevant to FNQ for climate refugia and connectivity planning.

Strategy 3.2 Maintain the integrity of FNQ's regional landscapes including inter-urban breaks, scenic amenity and coastal hillslopes.

CAFNEC strongly supports the focus on maintaining landscape integrity, particularly inter-urban breaks and scenic landscapes, which are critical to regional character, biodiversity connectivity and climate resilience. However, "integrity" needs measurable criteria and explicit links to biodiversity function and climate resilience, not just amenity.

Recommendation 3.2(a) Amend 3.2 to specify that maintaining integrity includes:

- preventing further loss of remnant vegetation and key habitat areas
- protecting and enhancing ecological connectivity and climate refugia
- maintaining ecosystem services that support regional resilience (floodplain function, coastal buffers, slope stability, heat moderation)

Recommendation 3.2(b) Strengthen Strategy 3.2 by explicitly prioritising avoidance of development that would compromise landscape integrity, rather than relying on mitigation at the development application stage.

Strategy 3.3 Enable opportunities for primary production, renewable energy, ecosystem services and tourism in the RLRPA that are appropriately located and compatible with long-term sustainable land management practices.

CAFNEC supports the intent to enable multiple compatible land uses within the RLRPA, including ecosystem services and tourism, where these align with long-term land management and biodiversity outcomes.

However, clearer guidance is needed to resolve conflicts where competing land uses may undermine ecological integrity or long-term sustainability.

Recommendation 3.3(a) Clarify how land use compatibility will be assessed where multiple uses are proposed, with explicit consideration of long-term impacts on regional biodiversity and landscape function. For example, by adding a conflict-resolution test and mitigation hierarchy to require that where land uses compete, decisions must apply a clear sequencing:

1. Avoid impacts to regional biodiversity network, SRAs, and climate refugia
2. Minimise and mitigate impacts
3. Offsets only as a last resort, and designed at landscape scale.

Recommendation 3.3(b) Ensure that ecosystem services and restoration-based land uses are recognised as legitimate and compatible long-term land uses within the RLRPA, particularly on marginal or degraded land.

Strategy 3.4 Prevent further fragmentation of the RLRPA to protect economically viable agricultural and rural land uses, and/or the regional biodiversity network. Reconfiguring a lot within the RLRPA should not occur if it creates lots smaller than the minimum lot size specified in the relevant local planning scheme in effect upon commencement of this regional plan, or 60ha if no minimum lot size is specified in the local government planning scheme, unless one of the following exceptions applies:

- a. *It is a boundary realignment that does not create additional lots, does not result in additional rural lifestyle lot or rural residential purposes lots, and improves agricultural efficiency, facilitates conservation outcomes or resolves boundary encroachments; or*
- b. *It creates one additional lot solely for infrastructure purposes; or*
- c. *It is part of a local government planning scheme amendment that is consistent with the RLA principles in Chapter 3.*

CAFNEC strongly supports the intent of Strategy 3.4 and the clear limits placed on reconfiguration of lots to prevent fragmentation of rural land and biodiversity networks. It can be strengthened by providing an explicit justification relating to biodiversity and climate-driven connectivity needs.

Recommendation 3.4 Strengthen the rationale and link to connectivity and climate refugia by adding an explicit statement that fragmentation prevention supports threatened species recovery trajectories and climate adaptation through connected refugia and altitudinal / latitudinal movement pathways.

Strategy 3.5 Protect the ecological values, landscape character and scenic amenity of the hillslopes including within the Cassowary Coast Regional Council, Douglas Shire Council, Wujal Wujal Aboriginal Shire Council and Yarrabah Shire Council areas.

CAFNEC supports explicit recognition of the sensitivity of hillslopes, particularly given erosion risk, visual impacts and biodiversity values.

Recommendation 3.5 Strengthen Strategy 3.5 by requiring cumulative impacts of hillslope development to be assessed at a landscape scale, not solely on a site-by-site basis.

Strategy 3.6 Planning and decision making considers the regional biodiversity network (Map 16 and Table 7) to:

- a. *Improve ecological processes and biodiversity conservation outcomes.*
- b. *Identify opportunities for revegetation.*

- c. *Increase resilience of natural habitats.*
- d. *Avoid natural habitat fragmentation and support ecological connectivity.*

CAFNEC strongly supports the inclusion of the Regional Biodiversity Network, SRAs and corridors as core planning considerations, and considers this Strategy key to achieving Policy Outcome 3. However, the Strategy would benefit from stronger language and direction.

Recommendation 3.6(a) Insert a requirement that planning decisions must deliver:

- Not net loss of mapped regional biodiversity network values in the short term, and
- Measurable net environmental gain by 2046 (condition, extent, connectivity).

Recommendation 3.6(b) Strengthen Strategy 3.6 by clarifying that development within or adjacent to the regional biodiversity network should avoid fragmentation and prioritise connectivity and habitat resilience.

Recommendation 3.6(c) Add a requirement for a regional monitoring framework (indicators, datasets, reporting intervals) so the Plan can be evaluated against the baseline.

Strategy 3.7 Opportunities are facilitated to revegetate the Strategic Rehabilitation Areas (SRA) shown on Map 16 to strengthen corridor connectivity and build natural landscape adaptation.

CAFNEC strongly supports the inclusion of SRAs and their role in strengthening ecological connectivity and landscape adaptation. However, the SRAs and connected corridors are at risk of being undermined unless the Plan clearly frames them as essential climate adaptation and biodiversity recovery infrastructure.

Recommendation 3.7(a) Lock in SRAs as a permanent regional mechanism (refinable, not removable), for example, by adding wording that SRAs are a core mechanism to deliver the regional biodiversity network and must be retained, with mapping to be refined and expanded over time through place-based planning with relevant stakeholders, including the Wet Tropics Restoration Alliance and local governments.

Recommendation 3.7(b) Clarify that SRAs should be protected from incompatible development that would undermine their long-term rehabilitation potential.

Recommendation 3.7(c) Expand the definition of SRAs to include areas that are currently cleared or degraded but could become future climate refugia if rehabilitated.

Strategy 3.8 Development in the Wet Tropics WHA and adjoining or ecologically connected areas does not cause adverse impacts on scenic amenity, regional biodiversity corridors and SRAs.

CAFNEC strongly supports the protection of the Wet Tropics World Heritage Area and its ecological connections.

Recommendation 3.8 Amend Strategy 3.8 to state that protecting scenic amenity and corridors must also protect climate refugia and movement pathways under warming, consistent with UNESCO's identification of climate change risk to Wet Tropics integrity.

Strategy 3.9 High risk biosecurity sites are planned for in a way that manages risks of

pests and diseases.

CAFNEC supports inclusion of biosecurity considerations in land use planning.

Recommendation 3.9 Strengthen Strategy 3.9 by requiring early identification and management of biosecurity risks in land use planning and development approvals, particularly in proximity to high-value ecosystems.

Strategy 3.10 The area depicted as 'Wet Tropics WHA - Special Management Area' on Map 16, is recognised as an area of high scenic amenity for the purpose of State code 23: wind farm development. In this area, development for a wind farm is avoided where possible, and must otherwise be sited and designed to protect the character, scenic amenity and landscape values for the locality and region.

CAFNEC supports recognition of scenic amenity and landscape values in wind farm siting decisions within the Wet Tropics WHA Special Management Area. However, the purpose of a Special Management Area extends beyond scenic amenity alone and includes protection of the ecological integrity, biodiversity values and cultural landscapes associated with the World Heritage Area and its connected environments.

Limiting explicit avoidance and siting requirements to wind farm development risks creating an inconsistent and overly narrow approach to managing impacts within an area of exceptional environmental value and sensitivity. Other forms of development may pose equal or greater risks to biodiversity, ecological connectivity, threatened species habitat and restoration corridors.

Recommendation 3.10(a) Amend Strategy 3.10 to explicitly recognise biodiversity values, ecological connectivity and threatened species habitat, in addition to scenic amenity and landscape values, as core considerations in the Wet Tropics WHA Special Management Area.

Recommendation 3.10(b) Strengthen the Strategy to clarify that the Special Management Area should be protected by all forms of development that are incompatible with its scenic, ecological and cultural values, with wind farm development identified as one example requiring heightened scrutiny.

Recommendation 3.10(c) Clarify that avoidance of incompatible development, including wind farm development, in the Special Management Area is the preferred planning outcome, with stringent siting and design requirements applied only where avoidance is demonstrably not feasible.

Theme 4: Healthy and Liveable Communities

CAFNEC supports the intent of the Draft FNQ Regional Plan 2025 to promote healthy, safe and liveable communities across Far North Queensland. Given the region's high exposure to climate-driven natural hazards, land use planning under this theme plays a critical role in reducing long-term risks to people, infrastructure, ecosystems and the regional economy.

This theme is therefore central to whether the Regional Plan meaningfully supports climate resilience, disaster risk reduction and equitable outcomes for communities over the next 20 years.

Policy Outcome 1: Community Identity and Wellbeing

CONTEXT & GROUNDS

CAFNEC strongly supports the intent of Policy Outcome 1 and considers it foundational to liveability, climate resilience and social cohesion in Far North Queensland. The emphasis on tropical design, inclusive public spaces, active lifestyles and recognition of First Nations culture, knowledge and traditions is appropriate and necessary given the region's climate, geography and cultural context.

Well-designed, inclusive and culturally informed places contribute directly to community wellbeing, public health outcomes, social connection and resilience to climate impacts such as extreme heat. As a statutory planning instrument, the Regional Plan has an important role in ensuring these outcomes are consistently embedded in land use planning and urban design across the region.

KEY ISSUE

While the intent of Policy Outcome 1 is strongly supported, several Strategies rely on high-level guidance or discretionary application and would benefit from stronger implementation direction. In particular, clearer links to FNQ's climatic conditions, explicit requirements to address extreme heat and stronger mechanisms to embed First Nations-led planning outcomes are needed to ensure these objectives are delivered equitably and consistently across communities.

The strategy-by-strategy comments below focus on strengthening the Draft Plan to better embed tropical design, heat resilience, inclusive placemaking and First Nations-led planning into statutory decision-making, rather than relying on aspirational guidance alone.

Strategy 1.1 Maintain the region's unique tropical character and regional identity by delivering well-designed development in accordance with QDesign (2018) and QCompanion (2021) design principles and integrating the key design concepts into local government planning schemes.

CAFNEC supports the use of QDesign and QCompanion as guiding frameworks for well-designed development and the recognition of FNQ's unique tropical character.

However, reliance on these frameworks alone risks inconsistent application across local government areas, particularly where local planning schemes do not clearly translate tropical design principles into enforceable provisions.

Recommendation 1.1(a) Strengthen Strategy 1.1 to require local government planning schemes to explicitly translate tropical design principles from QDesign and QCompanion into measurable and assessable planning provisions, rather than relying on high-level guidance alone.

Recommendation 1.1(b) Clarify that tropical design principles should explicitly respond to FNQ's climatic conditions, including extreme heat, humidity and rainfall intensity, to support long-term liveability and climate resilience.

Strategy 1.2 Design inclusive, safe and comfortable local environments that preference healthy lifestyles and encourage active community participation and positive social

behaviour by considering:

- a. accessibility and equity in urban design.*
- b. placemaking principles in accordance with QDesign and QCompanion, including shared spaces for collaboration and temporary experimentation in the nature and uses of streets.*
- c. increased walkability through accessible footpaths and access to open/ green spaces.*
- d. the principles of Crime Prevention Through Environmental Design – Guidelines for Queensland (2021), which is published on the Queensland Police Service website.*
- e. the design attributes in the Healthy Places, Healthy People Framework (2021)*
- f. the planning and design approach in Movement and Place (2024) g. mitigation against the impacts of urban heat and ultraviolet radiation (UVR) exposure.*

CAFNEC strongly supports the comprehensive scope of Strategy 1.2, including its references to accessibility, placemaking, walkability, CPTED, healthy design frameworks, Movement and Place, and mitigation of urban heat and UV exposure. This Strategy appropriately recognises that health, safety and wellbeing outcomes are shaped by the design of streets, public spaces and neighbourhoods.

However, the Strategy functions primarily as a list of considerations and does not clearly establish how these principles will be prioritised, balanced or embedded in statutory planning decisions.

Recommendation 1.2(a) Strengthen Strategy 1.2 by requiring local planning schemes and structure plans to demonstrate how the listed principles are integrated at neighbourhood and precinct scales, rather than considered on a discretionary, site-by-site basis.

Recommendation 1.2(b) Clarify that mitigation of urban heat and UV exposure is a core design requirement in FNQ, not an optional consideration, particularly in public spaces, streets and areas supporting active transport.

Recommendation 1.2(c) Prioritise accessibility, walkability and shade provision in areas of higher social vulnerability, including communities with limited access to private transport, older populations and areas with lower canopy cover.

Strategy 1.3 Encourage culturally informed land use planning which recognises and supports First Nations peoples' connection to Country, cultural values and traditional knowledge and incorporates Indigenous Land Use Agreements, where possible.

CAFNEC strongly supports the intent of Strategy 1.3 and the recognition of First Nations peoples' connection to Country, cultural values and traditional knowledge.

However, the use of the term “encourage” risks limiting the practical effect of this Strategy, particularly where planning processes do not have clear mechanisms for meaningful engagement or incorporation of Indigenous knowledge.

Recommendation 1.3(a) Strengthen Strategy 1.3 to move beyond encouragement and require culturally informed land use planning processes where First Nations interests are present, including early engagement and genuine participation.

Recommendation 1.3(b) Clarify how Indigenous Land Use Agreements and other formal agreements are to be recognised and operationalised within planning schemes and development assessment.

Strategy 1.4 Integrate outcomes of First Nations-led plans and studies into planning schemes and regional strategies.

CAFNEC strongly supports this Strategy and considers it a critical mechanism for ensuring First Nations-led planning outcomes meaningfully influence statutory planning decisions.

However, the Strategy would benefit from clearer guidance on how integration should occur and how conflicts between planning instruments are to be resolved.

Recommendation 1.4(a) Provide clearer direction on how outcomes of First Nations-led plans and studies are to be incorporated into planning schemes and regional strategies, including how they are to be weighted in decision-making.

Recommendation 1.4(b) Encourage resourcing and support for First Nations groups to lead the development of plans and studies intended to inform land use planning.

Strategy 1.5 As a part of local planning scheme reviews, consider land and infrastructure that is underutilised, is not required for future broader community use, and identify how it can be used to support economic, cultural and social outcomes for First Nations peoples.

CAFNEC supports the intent of Strategy 1.5, particularly its focus on identifying opportunities to support economic, cultural and social outcomes for First Nations peoples.

However, the Strategy lacks clarity on process and risks being inconsistently applied.

Recommendation 1.5(a) Clarify how local governments are expected to identify underutilised land and infrastructure and how opportunities for First Nations-led outcomes are to be prioritised within planning scheme reviews.

Recommendation 1.5(b) Encourage partnerships with First Nations organisations to co-design outcomes for identified land and infrastructure, rather than retrofitting uses after planning decisions are made.

Strategy 1.6 Identify and protect state and local landscape, heritage and cultural assets including Indigenous landscape values and, where appropriate, integrate or adaptively re-use them in buildings, streets and spaces.

CAFNEC supports the identification and protection of landscape, heritage and cultural assets, including Indigenous landscape values, and the encouragement of adaptive re-use where appropriate.

Recommendation 1.6 Strengthen Strategy 1.6 by clarifying that protection of landscape, heritage and cultural values should be integrated early in land use planning and growth area identification, not addressed solely at the development application stage.

Strategy 1.7 (Cairns Regional Council only) High frequency, reliable public transport and active transport options, supporting activation of Tropical Urban Villages, are achieved through implementation of the Cairns Transit Network and the coordinated development of the Active Transport network between TMR and Cairns Regional Council.

CAFNEC supports the intent of Strategy 1.7 and the focus on coordinated delivery of public and active transport to support Tropical Urban Villages.

However, limiting this Strategy to Cairns Regional Council risks missing broader opportunities to improve access, inclusion and reduced car dependence across FNQ urban centres.

Recommendation 1.7(a) Extend the principles of Strategy 1.7 to other FNQ urban centres, where appropriate, to support inclusive access, reduced emissions and healthier communities.

Recommendation 1.7(b) Strengthen the Strategy by explicitly linking transport activation with shade, heat mitigation and pedestrian comfort to ensure public and active transport are viable in FNQ's climate.

Policy Outcome 2: Natural hazards and safety

CONTEXT & GROUNDS

The Regional Plan has statutory weight and directly informs local government planning schemes, infrastructure investment, and development assessment across FNQ. As such, its approach to natural hazards must provide clear, future-focused guidance that reflects the region's evolving risk profile.

Far North Queensland is one of the most climate-exposed regions in Australia. Risks from flooding, extreme rainfall, cyclones, heat, landslides and coastal hazards are increasing and already shaping settlement patterns, infrastructure resilience, emergency response capacity and long-term community wellbeing. Planning frameworks that do not explicitly account for these increasing risks risk entrenching future exposure and recovery costs.

A strong regional planning framework is essential to:

- avoid maladaptive development;
- reduce future disaster recovery costs; and
- ensure that new growth and infill development do not increase exposure to known and emerging risks.

KEY ISSUE

While the Draft Plan acknowledges recent extreme events and includes strategies aimed at improving resilience, it does not consistently or explicitly require planning decisions to be informed by projected future natural hazard risks associated with climate change. This creates uncertainty for local governments and risks reliance on historical datasets that underestimate future exposure.

The strategy-by-strategy comments below set out where the Draft Plan is strong, where it can be improved, and how these improvements can be made through targeted amendments to the listed Strategies.

ANALYSIS & RECOMMENDATIONS

Strategy 2.1. Prepare and integrate assessments of risk including flood, bushfire, landslide

and coastal hazards, into local strategic planning, zoning and development decisions, including for infrastructure development, so that:

- a. development in new urban areas avoids areas of intolerable risk.*
- b. infill areas are only considered where a tolerable (or preferably acceptable) level of natural hazard risk can be achieved.*
- c. existing urban areas subject to intolerable risk are identified, and planning supports a staged withdrawal of development and infrastructure from these locations as risks increase over time, or coordinated implementation of adaptation solutions.*
- d. infrastructure planning is responsive to natural hazard risk, including ensuring broader connectivity to transport, support services and community networks that remain functional during and immediately after natural hazard events.*

CAFNEC strongly supports the intent of Strategy 2.1, particularly:

- the prioritisation of avoidance of intolerable risk in new urban areas (2.1a),
- the recognition that infill development should only proceed where tolerable or preferable acceptable risk can be achieved (2.1b), and
- the acknowledgement that some existing urban areas may require staged withdrawal or adaptation over time as risks increase (2.1c).

The inclusion of infrastructure connectivity and functionality during and after hazard events (2.1d) is also an important and necessary consideration for FNQ.

While Strategy 2.1 makes reference to risks increasing over time, it does not explicitly require that risk assessments be informed by projected climate change impacts. Without this clarify, there is a real risk that:

- assessments rely on historical datasets,
- “tolerable risk” thresholds are applied inconsistently, and
- future exposure is underestimated, particularly in floodplains, coastal areas and heat-exposed urban environments.

Recommendation 2.1(a) Amend Strategy 2.1 to explicitly require that all natural hazard risk assessments be based on current and projected future risk, including climate change projections relevant to FNQ.

E.g. “Risk assessments must consider projected climate change impacts, including increases in flood intensity, extreme rainfall, extreme heat and coastal hazard.”

Recommendation 2.1(b) Clarify that “tolerable” and “acceptable” risk thresholds for infill development must be demonstrated under future hazard scenarios, not historical considerations alone.

Recommendation 2.1(c) Strengthen clause (c) by requiring local governments to identify areas subject to increasing future risk and develop clear planning pathways for either staged withdrawal or coordinated adaptation, supported by regional guidance and consistent datasets.

Strategy 2.2. Recognise the contribution of areas with natural features, greenspace and water to mitigating extreme weather events and incorporate these features in urban design and the preferred growth pattern for the region.

CAFNEC supports the recognition of greenspace, water and natural features as critical mitigation assets for extreme weather, including flooding and heat. This aligns with the best-practice approaches to nature-based solutions for climate adaptation.

Strategy 2.2 does not clearly articulate:

- the climate adaptation function of these areas,
- how they should be prioritised or protected within the preferred growth pattern, or
- how competing land use pressures will be managed.

Without stronger direction, the role of these areas risks being treated as discretionary or secondary to development outcomes.

Recommendation 2.2(a) Strengthen Strategy 2.2 to explicitly recognise natural features, greenspace and waterways as climate adaptation infrastructure, not just urban design elements.

Recommendation 2.2(b) Include direction that these areas be protected, enhanced, and strategically expanded in locations most exposed to flood, heat and extreme weather risk, particularly within urban and growth areas.

Strategy 2.3. Incorporate heatwave, extreme heat and urban heat considerations into land use planning and urban design, including urban greening, building orientation and cross-ventilation, light-coloured roof materials and pavements.

CAFNEC strongly supports the inclusion of heatwave, extreme heat and urban heat considerations. Extreme heat is already a significant public health and liveability issue in FNQ and will worsen with climate change.

The Strategy lists useful design responses but does not:

- Explicitly link extreme heat to climate change,
- Establish minimum performance expectations, or
- Require heat mitigation to be addressed early in land use planning decisions.

Recommendation 2.3(a) Amend Strategy 2.3 to explicitly recognise extreme heat as a climate-driven hazard with significant health, equity and infrastructure implications in FNQ.

Recommendation 2.3(b) Require local planning schemes and structure plans to demonstrate how extreme heat risks will be mitigated at the neighbourhood and precinct scale, not solely at the individual building level.

Strategy 2.4. Support active transport and improve pedestrian comfort by mitigating against the impacts of urban heat and ultraviolet radiation (UVR) exposure, through increased tree canopy cover.

CAFNEC supports the clear link made between active transport, pedestrian comfort and mitigation of heat and UV exposure through increased tree canopy cover.

The Strategy would benefit from clearly integration with:

- active transport networks,
- priority pedestrian routes, and

- areas with high vulnerability to heat, including disadvantaged communities.

Recommendation 2.4 Strengthen Strategy 2.4 by requiring heat and UV mitigation measures be prioritised along key pedestrian and active transport corridors, particularly around schools, centres, transport hubs and community facilities.

Strategy 2.5 (Cairns Regional Council only). Increase tree canopy cover to a minimum of 50% within the Urban Footprint at a neighbourhood scale by 2046.

CAFNEC strongly supports the establishment of a quantified canopy target. This provides clarity, accountability and a measurable climate adaptation outcome.

However, Strategy 2.5 is limited to Cairns Regional Council, despite extreme heat and canopy loss being region-wide issues across FNQ urban areas.

Recommendation 2.5(a) Extend the extent of Strategy 2.5 across all FNQ local governments, with regionally appropriate canopy targets informed by climate exposure, urban form and community vulnerability.

Recommendation 2.5(b) Include interim canopy targets and monitoring requirements to ensure progress toward the 2046 goal and avoid delayed implementation.

RESPONSE TO CHAPTER 5: DELIVERY

CONTEXT & GROUNDS

CAFNEC supports the intent of Chapter 5 to clarify how the Draft FNQ Regional Plan 2025 will be implemented through Queensland's planning framework, including local government plan-making, development assessment, infrastructure planning and coordination across levels of government.

The acknowledgement that delivery relies on a combination of statutory instruments, non-statutory mechanisms, funding programs, and collaboration between government, industry, community and non-government organisations is appropriate. CAFNEC also supports the recognition that regional planning is cyclical and requires ongoing monitoring, reporting and review to remain effective over time.

Given the statutory role of the Regional Plan and its long-term influence on land use, infrastructure and environmental outcomes across Far North Queensland, the Delivery chapter is critical to whether the Plan's stated policy outcomes, particularly those relating to biodiversity, water quality, climate resilience and landscape protection, are realised in practice.

KEY ISSUES

1. Absence of Clear Implementation Mechanisms for Environmental Outcomes

While Chapter 5 outlines roles and responsibilities at a high level, it does not establish clear, accountable mechanisms to translate environmental and biodiversity policy outcomes into measurable and enforceable actions. The Delivery chapter does not specify implementation

timelines, responsible agencies for specific outcomes, performance indicators, or reporting requirements linked to environmental objectives.

Without explicit delivery mechanisms, there is a risk that environmental outcomes remain aspirational rather than operational, particularly where they compete with development pressures or short-term economic objectives.

Planning literature and evaluations of regional planning frameworks demonstrate that environmental policies are significantly less effective where implementation, accountability and monitoring arrangements are weak or undefined.³

Recommendation 1: Include clearer implementation protocols for environmental and biodiversity-related policy outcomes, including:

- identification of lead and supporting agencies for key outcomes,
- indicative timeframes or milestones,
- defined performance indicators, and
- regular public reporting on progress against environmental objectives.

2. Lack of integration of climate change risk into delivery mechanisms

Although the Draft Plan acknowledges natural hazards and environmental pressures in earlier chapters, Chapter 5 does not clearly integrate climate change adaptation and mitigation into delivery mechanisms. There is no guidance on how climate risk assessments, adaptive management or scenario planning are to be operationalised through plan implementation, monitoring or review.

Given Far North Queensland's high exposure to climate-driven risks, including extreme rainfall, flooding, heat, coastal impacts and ecosystem stress, the absence of climate-responsive delivery mechanisms undermines the Plan's capacity to achieve its stated environmental and resilience objectives.

Research on regional planning consistently highlights the importance of embedding climate risk management into delivery frameworks, rather than treating climate considerations and contextual or discretionary.⁴

Recommendation: Strengthen Chapter 5 by requiring:

- incorporation of climate risk assessment and adaptation considerations into plan implementation and review processes, and
- use of adaptive management approaches, including defined triggers for review where climate impacts or environmental thresholds are exceeded.

3. Insufficient provision for baseline biodiversity and impact monitoring

³ Galler, Albert & von Haaren (2016) From regional environmental planning to implementation: Paths and challenges of integrating ecosystem services, *Ecosystem Services*, vol 18, p. 118-129, <https://www.sciencedirect.com/science/article/pii/S2212041616300572>

⁴ Matthews, Tony. (2014). Storylines of Institutional Responses to Climate Change as a Transformative Stressor: The Case of Regional Planning in South East Queensland, Australia. *Environment and Planning C Government and Policy*. 33. doi: 10.1177/0263774X15610054.

Chapter 5 does not establish mechanisms to assess baseline ecosystem condition or to monitor changes in biodiversity and ecological health over time. While biodiversity is a stated objective of the Plan, the Delivery chapter lacks processes for quantifying current conditions or measuring whether land use planning and development decisions are improving or degrading environmental outcomes.

Without baseline data and ongoing monitoring, it is not possible to evaluate cumulative impacts, assess the effectiveness of planning policies, or adapt management responses where outcomes are not being achieved.⁵

Best-practice conservation and land use planning emphasise that systematic biodiversity assessment and long-term monitoring are essential to evidence-based decision-making and adaptive planning.⁶

Recommendation: Include commitments in Chapter 5 to:

- establish or align with region-wide biodiversity baseline assessments, and
- support ongoing monitoring programs that track ecosystem condition, habitat connectivity and cumulative impacts, with results informing future plan reviews.

4. Limited provision for ongoing community and Traditional Owner participation in delivery and oversight

While Chapter 5 recognises the role of community, industry and non-government organisations, and note engagement with Traditional Custodians, it does not establish formal mechanisms for ongoing participation in implementation, monitoring or review of outcomes.

Meaningful involvement of Traditional Owners and local community in delivery and oversight is particularly important in Far North Queensland, given the region's cultural landscapes, biodiversity values and reliance on local stewardship.

Evidence from conservation and natural resource management consistently shows that inclusive governance arrangements improve environmental outcomes and support culturally appropriate, place-based decision-making.⁷

Recommendation: Strengthen Chapter 5 by establishing formal mechanisms for ongoing participation by Traditional Owners, community representatives and relevant non-government organisations in:

- monitoring and evaluation of environmental outcomes, and
- adaptive review of the Regional Plan where outcomes are not being achieved.

⁵ Lowe, Fitzsimons, Straker, & Gleeson. (2003). Mechanisms for Improved Integration of Biodiversity Conservation in Regional Natural Resource Management Planning within Australia: Literature Review.

⁶ Lindenmayer et al. (2012) Improving biodiversity monitoring. *Austral Ecology*, 37(3), 285–294. doi: 10.1111/j.1442-9993.2011.02314.x

⁷ Dawson et al. (2021) The role of Indigenous peoples and local communities in effective and equitable conservation. *Ecology and Society* 26(3):19. <https://doi.org/10.5751/ES-12625-260319>

Conclusion

CAFNEC supports the overarching intent of the Draft Far North Queensland Regional Plan 2025 and recognises the significant effort involved in developing a place-based planning framework for a region as diverse and complex as Far North Queensland.

However, the effectiveness of the Regional Plan will ultimately depend on whether it is sufficiently clear, robust and future-focused to change its current trajectories of environmental decline, climate risk and cumulative land use impacts.

Across Themes 3 and 4, CAFNEC considers that the Draft Plan would be substantially strengthened by:

1. Explicitly acknowledging the baseline condition and declining trajectory of regional biodiversity and ecosystems;
2. Embedding climate change as a core driver of risk that must shape land use planning decisions;
3. Prioritising avoidance of impacts to high-value environmental assets, rather than reliance on mitigation at later stages;
4. Strengthening protection and long-term security of the regional biodiversity network and Strategic Rehabilitation Areas; and
5. Ensuring Policy Outcomes and Strategies are supported by clear delivery mechanisms, monitoring frameworks and accountability arrangements.

Chapter 5 is particularly critical in this regard. Without clear implementation pathways, performance indicators, baseline monitoring and inclusive governance arrangements, the Regional Plan risks remaining aspirational rather than operational, particularly in relation to biodiversity protection, water quality and climate resilience.

CAFNEC would welcome the opportunity to continue engaging with the Queensland Government on the refinement and implementation of the Regional Plan.

Should you require any further information, please contact me.



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