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To the Deputy Premier, Minister for State Development,
Infrastructure and Planning and Minister for Industrial Relations
Department of State Development, Infrastructure and Planning
planningforqueensland@dsdip.qld.gov.au

CAFNEC submission on the draft Queensland State Planning Policy 2026

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Introduction and grounds of submission

CAFNEC welcomes the opportunity to comment on the draft State Planning Policy 2026 (SPP), the natural hazards discussion paper, proposed assessment benchmarks and draft amendments to the Minister's Guidelines and Rules (MGR).

CAFNEC is the conservation council for the region from Cardwell north to Zenadth Kes (Torres Strait), and from the east coast to the Gulf of Carpentaria. Since 1981, we have worked with communities to protect the natural environment of Far North Queensland. Our region includes the Great Barrier Reef and Wet Tropics World Heritage Areas, coastal and inland communities, agricultural landscapes and places of profound cultural significance.

For FNQ, climate change and environmental protection are central to planning for the future. Where we build, what we protect and how we prepare for disasters will shape the safety of our communities and the survival of our extraordinary natural environment for generations.

Queensland needs more safe, affordable homes, reliable infrastructure and secure livelihoods. Achieving these things requires planning grounded in climate science and environmental protection. Removing explicit recognition of climate change from the state's central planning policy weakens the direction councils need to assess future risks and creates uncertainty for communities about the protection they can expect. It also undermines confidence that the government will act on established scientific evidence when making decisions with consequences for generations. Queenslanders need clear, consistent leadership on climate

change. A policy that removes this direction while climate risks increase falls well short of that responsibility.

CAFNEC does not support adoption of the draft in its present form. Our principle grounds are that it:

- Removes explicit recognition of climate change without providing an adequate replacement framework for adaptation and emissions reduction;
- Weakens the priority given to avoiding new natural hazard exposure, while leaving important risk thresholds undefined;
- Fails to expressly recognise extreme heat within its natural hazard policies and mapped-area definition;
- Gives environmental protection an inadequate place in the strategic aspirations used to balance competing interests;
- Weakens aspects of biodiversity policy and removes the dedicated policy on Aboriginal and Torres Strait Islander cultural heritage; and
- Leaves important implementation, mapping, assessment and transition arrangements unresolved.

We support clearer documents, coordinated infrastructure, housing diversity, well-located density, public and active transport, protection of natural hazard buffers, and explicit consideration of cumulative impacts. These improvements should be retained. However, clarity and efficiency must be measured by the quality and durability of outcomes, alongside processing time.

Our central request is that the final SPP set clear minimum protections for people and the environment, then direct growth to places that can meet them. Broad aspirations to increase supply or productivity should not provide a basis for accepting avoidable harm, and Queenslanders should not inherit avoidable disaster risks and environmental losses because a development was easier or cheaper to approve today.

Priority changes requested

The following priorities summarise our detailed recommendations below.

1. Restore explicit climate change adaptation and emissions reduction requirements across the SPP. Require current climate projections and assessment over the full life of development, and align settlement, transport and energy planning with Queensland's legislated emissions targets.

2. Add strategic aspirations for biodiversity protection and restoration, climate resilience and First Nations rights. Give environment and cultural heritage distinct policy standing, separate from efficient growth, and require published reasons when competing interests are balanced.

3. Retain the requirement to avoid natural hazard exposure before relying on mitigation. Require assessment of safer locations and designs, and consider interacting hazards,

cumulative development and evacuation capacity across whole catchments and connected communities.

4. Retain an explicit requirement for natural hazard risk assessments. Define acceptable, tolerable and intolerable risk in binding planning rules, set minimum safety standards and require independent review of higher-risk proposals, funded by the developer.

5. Require evacuation and shelter arrangements to account for people with disability, households without vehicles and others who need assistance. Establish state-wide limits on development where life safety, essential services or reliable long-term protection cannot be secured, or where development would significantly increase risk elsewhere.

6. Require flood and coastal assessments to use current climate projections and examine events beyond the chosen design standard. Restrict new development in erosion-prone areas, protect space for coastal ecosystems to move landward, and support community-led adaptation for existing settlements.

7. Explicitly include extreme heat and heatwaves in the natural hazard policies and definitions. Require local heat risk assessment, measurable canopy and shade targets, and climate-responsive design, supported by a funded statewide program (e.g. QHeat2050).

8. Restore a dedicated policy for matters of local environmental significance and the requirement to avoid adverse impacts on state and local environmental values. Allow stronger evidence-based local protections, and require regional planning for habitat connectivity, climate refugia, restoration and cumulative impacts.

9. Restore dedicated Aboriginal and Torres Strait Islander cultural heritage policy. Require early, funded Traditional Owner participation in planning, hazard mapping and major development assessment, with protection for cultural landscapes and control over the use of cultural knowledge.

10. Retain enforceable stormwater and water-quality requirements, protect natural water flows, wetlands and riparian vegetation, and assess cumulative catchment impacts. Require clear responsibility for maintaining and monitoring water-treatment measures throughout development's life.

11. Direct housing to safe, serviced locations and assess affordability through ongoing cooling, transport, insurance and disaster costs. Restore explicit support for renewable energy and emissions reduction, with regional assessment of energy projects and safeguards for biodiversity, cultural values, productive farmland and neighbouring communities.

12. Publish and consult on the complete revised benchmarks, including their application to existing schemes and development. Reconsult on substantive changes and commence the SPP and supporting regulation together, without gaps or reductions in protection.

13. Set state minimum mapping standards while allowing validated local refinement and stronger protection. Fund councils to update hazard studies and planning schemes,

retain meaningful community participation, resolve compensation exposure under the proposed MGR pathway, and publish clear transition arrangements.

14. Require public reporting on hazard exposure, heat risk, habitat condition and connectivity, water quality, lifetime housing costs and participation. Report unequal impacts on disadvantaged communities and First Nations peoples, and revise the policy where results show that protections are inadequate.

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1. Restore climate change to the foundations of planning

The draft SPP removes the words “climate change” from the state’s central planning policy. The 2017 policy explicitly required planning for its projected effects on natural hazards. The new draft refers to future risk and retains some coastal allowances, but gives councils no equivalent clear direction to plan for climate change across housing, infrastructure, energy and the environment.

Homes and infrastructure approved today will be used for decades. The climate they face will change during that time. If planning is based on past conditions, communities will be left with homes that become harder to cool, roads that flood more often, and protective measures that no longer keep them safe. This is why climate change must be named and addressed throughout the policy.

The science provides clear direction. The Bureau of Meteorology and CSIRO document continuing warming, more extreme heat, more intense heavy rainfall, more intense cyclones, and rising sea levels; and assert the need for future planning that accounts for these changes.[1] For the Wet Tropics, scientists have high confidence that extreme rainfall will become more intense. Flood planning must account for that growing danger.

The 2025 National Climate Risk Assessment identifies interacting risks across communities, infrastructure, health, ecosystems and the economy. It finds that climate hazards worsen under all plausible futures and that early action reduces long-term costs.[2] These are directly relevant considerations for a policy governing the location and form of development.

The Planning Act 2016 makes ecological sustainability its purpose. It expressly addresses development’s contribution to climate change, while section 5 requires relevant functions and powers to be exercised in ways that advance the Act’s purpose.[3] Its provisions also recognise precaution, intergenerational equity and community involvement.

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[1] Bureau of Meteorology and CSIRO (2024). State of the Climate 2024, Australia's changing climate and future projections.
https://www.bom.gov.au/weather-and-climate/past-weather-and-climate/state-of-the-climate-2024/australias-changing-climate, https://www.csiro.au/en/research/environmental-impacts/climate-change/climate-change-information

[2] Australian Government, Department of Climate Change, Energy, the Environment and Water (2025). Assessing Australia's climate risks: National Climate Risk Assessment findings and process.
https://www.dcceew.gov.au/climate-change/policy/adaptation/ncra

[3] Planning Act 2016 (Qld), particularly ss.3-5 and 8.
https://www.legislation.qld.gov.au/view/html/inforce/current/act-2016-025

The SPP should turn those commitments into clear planning requirements. It should also help deliver Queensland's emissions targets, legislated in the Clean Economy Jobs Act 2024: at least 30% below 2005 levels by 30 June 2030, at least 75% by 30 June 2035, and net zero by 30 June 2050.[4]

The SPP should distinguish climate adaptation from emissions reduction and require both. Planning should reduce emissions through settlement patterns, transport choices, energy efficiency and appropriate renewable energy infrastructure, while preparing for unavoidable impacts.

Recommendation 1: Insert an overarching requirement that regional plans, local planning instruments and relevant development assessment account explicitly for climate change. Require use of current climate science and assessment of risk over the intended life of development. Require planning to reduce emissions through the location and design of communities, transport and energy infrastructure.

Suggested policy wording:

"Planning and development prepare communities and ecosystems for climate change and help reduce greenhouse gas emissions. Decisions account for projected climate change over the life of development, including changing heat, rainfall, flooding sea level, coastal hazards and relevant interactions between hazards. Development is located and designed to avoid creating unacceptable future risk or relying on protective works for which responsibility and funding have not been secured."

2. Rebalance the strategic aspirations

The draft's six strategic aspirations focus on housing, productivity, infrastructure, efficient land use, and industry. They include some useful environmental commitments, but none makes protecting and restoring nature, or preparing for climate change, an aspiration in its own right.

These aspirations matter because the draft uses them to guide decisions when state interests compete. If growth and productivity dominate the framework used to resolve those conflicts, environmental protection begins at a disadvantage. The final policy needs to say clearly that healthy ecosystems, climate resilience and protection of cultural heritage are outcomes Queensland is actively planning to achieve.

Combining environment and heritage with "efficient growth" reinforces this problem. Biodiversity, coastal environments and cultural heritage need their own clear policy standing, as they contain intrinsic significance and provide the conditions on which communities depend. Their protection should guide where development goes, rather than depend on how readily they can be accommodated within a growth proposal. They should receive clear recognition independently of their contribution to development efficiency.

The consequences are particularly serious in FNQ. The Reef Authority identifies climate change as the greatest threat to the Great Barrier Reef, with runoff and coastal development adding to

[4] Clean Economy Jobs Act 2024 (Qld), s.5. https://www.legislation.qld.gov.au/view/html/inforce/current/act-2024-016

the pressure.[5] The Wet Tropics Management Authority identifies climate change as the most significant threat to the World Heritage Area's ancient plants and animals.[6] Protecting these places must be a central purpose of planning in our region.

Recommendation 2.1: Add clear strategic aspirations to protect and restore nature, reduce emissions, prepare for climate change and respect First Nations rights and relationships with Country. Give environment and cultural heritage distinct policy standing, and address efficient growth alongside housing and infrastructure.

Recommendation 2.2: Require decision makers to publish their reasons when they balance competing interests. Reasons should identify the values affected, alternative locations or designs, cumulative and lifetime consequences, and the evidence supporting the outcome.

3. Retain avoidance as the first response to natural hazards

The discussion paper proposes a shift from avoiding hazard-prone locations first to allowing development wherever risks can be reduced to an "acceptable" or "tolerable" level. Draft Natural hazards and safety policy 1(b) reflects that change. Yet policy 2(a) still gives priority to avoiding hazards when locating infrastructure. Homes deserve the same priority: keep people out of danger wherever possible.

CAFNEC strongly opposes weakening this approach. The existing framework already allows measures to reduce risk where avoiding a hazard area is not possible. The proposed change would weaken the requirement to first consider a safer location.

A raised floor, flood barrier or evacuation plan may reduce danger, but it also creates ongoing responsibilities. Protective works need maintenance. Evacuation routes must remain open. Emergency services need the capacity to respond. Climate change and further development can make the original measures less effective. Choosing a safer location at the outset avoids passing these problems to future residents.

The costs are also unevenly shared. A proponent may receive the immediate return from development, while future residents face insurance and repair costs, councils inherit drainage and access obligations, and emergency services carry rescue demands. An assessment of community benefit should account for those transfers in cost. Those long-term costs must be part of the decision about whether development should proceed. The IPCC warns that delaying adaptation leads to more costly impacts and harder choices later.[7]

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[5] Great Barrier Reef Marine Park Authority (2024). Great Barrier Reef Outlook Report 2024, Executive Summary. https://outlookreport.gbrmpa.gov.au/about/executive-summary

[6] Wet Tropics Management Authority (2019). Accept, Act, Adapt: Climate Adaptation Plan for the Wet Tropics 2020-2030; and the Authority's current overview of the plan and implementation. https://www.wettropics.gov.au/about-us/corporate-information/plans%2C-strategies-and-agreements/climate-adaptation-plan-for-the-wet-tropics

[7] Intergovernmental Panel on Climate Change (2022). Climate Change 2022: Impacts, Adaptation and Vulnerability, Working Group II, Chapter 11: Australasia, particularly Executive Summary, sections 11.5 and 11.7, and Box 11.6. https://www.ipcc.ch/report/ar6/wg2/chapter/chapter-11/

Existing communities need support to become safer. Improving an existing home or essential facility is a different task from approving a new subdivision. The policy should recognise that difference: helping people already at risk must not become a justification for putting more people in harm's way.

Recommendation 3.1: Retain avoidance as the first planning response. Require developers to demonstrate that they have considered safer locations and designs before relying on protective measures. Apply this requirement to housing as well as infrastructure. Where exposure cannot be avoided, reduce it as far as possible and require the remaining risk to meet clear safety standards.

Ex-Tropical Cyclone Jasper brought record rainfall, flooding, landslips, road closures and power disruption across Far North Queensland in December 2023. Bureau records show five-day rainfall exceeding 1,000 mm at multiple stations and a Daintree River peak at Daintree Village above the previous record.[8] The Cairns recovery plan records flood impacts across the Barron Delta, including residential communities and Cairns International Airport.[9] Cook Shire's post-event review describes major access and resourcing constraints during the evacuation of Wujal Wujal's residents.[10]

These experiences show why keeping a floor above a selected flood level is not enough. People also need safe roads, drinking water, power, medical care and help when they cannot leave on their own. A building can remain standing while the community around it becomes unsafe.

Recommendation 3.2: Assess hazards together and across the whole catchment and connected communities. Consider how river flooding, local drainage, storm tide, sea-level rise and landslides can interact; how a sequence of events could affect recovery; and how new development changes risks for others. In FNQ catchments, including the Barron, Daintree and Mossman, assess flood storage, downstream effects and evacuation capacity alongside risks on the development site.

4. Set clear safety rules and require proper risk assessments

The government proposes allowing more development on the basis that risk can be made "acceptable" or "tolerable", but the draft does not define those terms. At the same time, it proposes removing the direct requirement for a risk assessment, arguing that the need for one is already implied by other policies.

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[8] Bureau of Meteorology (1 January 2024). Queensland in December 2023, Monthly Climate Summary, rainfall and significant weather; and Tropical Climate Update, 19 December 2023.
https://www.bom.gov.au/climate/current/month/qld/archive/202312.summary.shtml
https://www.bom.gov.au/climate/tropical-note/archive/20231219.archive.shtml

[9] Cairns Regional Council (2024). Tropical Cyclone Jasper Local Disaster Recovery Plan, particularly timeline p.9. Original council plan hosted by the Queensland Reconstruction Authority.
https://www.qra.qld.gov.au/sites/default/files/2024-07/Cairns_City_Council_Local_Recovery_and_Resilience_Plan_Tropical_Cyclone_Jasper_2023.PDF

[10] Cook Shire Council (2024). TC Jasper External Review, particularly p.10, evacuation and resourcing constraints. Original post-event review commissioned and published by the council.
https://www.cook.qld.gov.au/wp-content/uploads/2024/09/Cook-Shire-Council-Post-TC-Jasper-External-Review-2024-.pdf

That leaves a basic question unanswered: how will a council decide that a place is safe enough to build in? Residents should be able to understand what protection they can expect. Councils should have clear rules to apply. Developers should know what they must demonstrate before approval.

The state should explain the three risk categories in practical terms:

- *Acceptable risk* means the remaining danger is low enough to meet clear safety standards. People's safety should not depend on extraordinary rescue efforts or major ongoing protective works.
- *Tolerable risk* means some danger remains and development can proceed only in clearly defined circumstances, with effective safeguards. Someone must be responsible for maintaining those safeguards, paying for them and checking that they continue to work.
- *Intolerable risk* means the danger is too great for the development to proceed. This includes situations where the measures needed to keep people safe cannot be relied on for as long as the development will be used.

Spending what a developer considers reasonable does not necessarily make a place safe. If serious danger remains after the proposed measures are in place, the development should not be approved. Nor should a promise of future flood protection be enough when nobody has committed to build or maintain it.

A proper assessment should explain who could be harmed, how the danger could change over time, what the proposed safeguards depend on and what happens if they fail. For example, a flood barrier may protect a house while the only access road is cut. The assessment must address both.

Recommendation 4: Keep a clear requirement for a natural hazard risk assessment, with detail suited to the development and the danger involved. Put the minimum safety standards, circumstances where development must be refused, and responsibilities for ongoing protection into binding planning rules. Supporting guidance should explain how to meet those rules. For higher-risk proposals, require an independent expert check arranged by the assessing authority and paid for by the developer.

5. Plan for everyone’s safety

The discussion paper recognises that some uses, such as hospitals and childcare centres, accommodate people who need help to evacuate. People who need assistance also live in ordinary homes. Planning for residential areas must recognise this from the outset.

An evacuation plan that assumes everyone can drive, walk quickly or respond immediately to a warning will leave people behind. Assessments must include people with disability, older people, children, households without vehicles, people needing medical support and people facing language or communication barriers. Visitors may also be unfamiliar with local warnings and escape routes.

The draft allows infrastructure to provide "refuge in place" where safe. Sheltering in a building can be appropriate in some circumstances, but being above floodwater does not establish that occupants can safely remain there. They may need drinking water, sanitation, cooling, medication, power and communication for days. The building must also withstand the event. What works as a cyclone shelter may not work as a flood refuge.

Recommendation 5.1: Require evacuation and shelter plans to account for the people who will actually use a development and the capacity of surrounding roads and services. Seek emergency management agency input. Allow sheltering in place only where there is clear evidence that occupants can remain safe for the expected duration. Do not assume emergency services will be able to rescue people when the planned safeguards fail.

Recommendation 5.2: Establish statewide limits on new development where danger to life is too great, people cannot evacuate or shelter safely, essential services cannot operate safely, or the proposal would significantly increase danger elsewhere. Refuse development where the measures needed to keep it safe cannot be maintained for its lifetime. Apply additional protection to hospitals, aged care, childcare and other uses where occupants need assistance, and avoid irreversible harm to environmental and cultural values.

6. Plan for future floods and coastal change

Flood planning must use current climate science. Australian Rainfall and Runoff, the national flood-estimation guidance, has been updated to account for climate change. The Australian Government identifies version 4.2 as the guidance to use for detailed assessments.[11] Queensland's planning requirements should keep pace with this work.

The phrase "one in 100 years" can also give people a false sense of security. A flood with a 1% chance of occurring in any year can happen more than once in a short period. Even if that annual chance stayed the same, it would mean roughly a 40% chance of at least one such flood over 50 years. Climate change is altering those odds further, particularly in Far North Queensland where extreme rainfall events are becoming more intense. Planning must consider what happens when a flood exceeds the level a building or road was designed for.

Recommendation 6.1: Assess a range of flood events, including more severe events than the chosen design flood. Use current climate projections, test how changes in assumptions affect the result, and provide an appropriate safety margin above predicted flood levels. Assess the consequences for roads, essential services and people who may become isolated. Look beyond 2100 where development or settlement patterns will last longer.

[11] Australian Government, Department of Climate Change, Energy, the Environment and Water (updated 15 April 2026). Climate change and flood risk; and Geoscience Australia, Australian Rainfall and Runoff, national guideline portal. See ARR Book 1, Chapter 6, Climate Change Considerations, updated 2024, version 4.2 as identified by the Department. https://www.dcceew.gov.au/climate-change/policy/climate-science/climate-change-flood-risk, https://arr.ga.gov.au/

Coastal communities need the same long-term approach. The draft retains sea level rise in its storm tide definition and refers to coastal technical guidance (pp.51-52, 62). Those provisions need clear, current assumptions that are regularly reviewed as the science develops.

Beaches, dunes, wetlands and mangroves also need room to respond to rising seas. Building up to their edges can leave them trapped between development and the ocean. Future residents may then face pressure for seawalls that protect buildings at the expense of beaches, habitat and public access.

The draft also allows some urban development in erosion-prone areas already within an urban area or regional urban footprint, alongside more specific restrictions in coastal management districts (p.34). A line on a growth map does not make land safe. The government must explain how these provisions work together and ensure that growth boundaries do not become a reason to accept avoidable coastal risk.

Recommendation 6.2: Retain strong restrictions on new development in erosion-prone areas, use current sea level and coastal hazard projections, and protect space for coastal ecosystems to move landward. Avoid approving development that will depend on future seawalls or repeated public subsidy. Help existing communities plan fair responses to coastal change, including relocation where necessary, with affected residents and Traditional Owners involved from the beginning.

7. Treat extreme heat as a natural hazard

CAFNEC welcomes the draft's policy to reduce the urban heat island effect. However, its definition of a "natural hazard area" lists flood, bushfire, landslide, erosion and storm tide areas, with no equivalent recognition of heat (pp.30, 58). Councils need clear state direction to identify dangerous heat exposure and reduce it through planning.

The government's own discussion paper recognises extreme heat as a natural hazard (p.3). The final SPP should do the same in the policies councils must apply.

Recommendation 7.1: Name extreme heat and heatwaves in the Natural hazards and safety interest. Update the definitions of natural hazard and natural hazard area so councils can identify heat-risk areas and plan for them.

Suggested policy wording:

"Planning identifies and reduces current and future risks from extreme heat and heatwaves. Development retains and provides suitable trees and shade, supports cooling and airflow, and gives people safe access to services and cool public spaces. Heat assessments account for local conditions, including humidity, hot nights and power failures."

Heat also affects rural and remote communities. Reducing heat trapped by buildings and roads is only part of the response.

Furthermore, communities in FNQ need measures suited to humid coastal conditions, hotter inland communities and different settlement types. Shade and vegetation must work with ventilation, suitable building design and reliable cooling. Measuring the temperature of roofs and roads alone will not tell us whether people are safe.

The National Climate Risk Assessment identifies growing heat-related health risks, particularly in northern Australia.[12] This makes heat planning essential for homes, workers' accommodation, schools, transport stops and public spaces.

Recommendation 7.2: Require regional plans and local schemes to assess heat risk and set measurable responses. These should include:

- protecting suitable mature trees and providing space, soil and care for new trees to survive;
- local targets for canopy, shade and surfaces that allow water to soak into the ground;
- shaded, accessible routes to schools, shops, public transport and essential services;
- building and neighbourhood design that provides shade and airflow;
- planting suited to the local climate and cyclone risk, with realistic water and maintenance needs; and
- accessible, affordable cool public spaces, including arrangements for power outages.

Local planning should identify where urban heat reduction through increased green space is most needed and measure whether it is improving conditions for residents.

Heat resilience is also part of housing affordability. A cheap house that costs too much to cool can leave residents choosing between their health and their electricity bill. Planning and building requirements should work together to deliver homes that are comfortable and affordable to live in throughout their lives.

Recommendation 7.3: Fund a statewide heat-resilience program, such as QHeat2050, to help councils map heat risk, work with communities, update planning schemes and put practical protection in place. Direct funding according to need and council capacity, including dedicated support for Aboriginal and Torres Strait Islander councils. Build on the coordinated support provided through QCoast2100.

8. Strengthen biodiversity and local protections

The draft weakens the direction councils can rely on to protect locally important nature. It removes the dedicated 2017 policy for matters of local environmental significance (MLES) and introduces an avoidance test based on "significant adverse impacts" (p.30). Local values remain within the draft's general environmental definitions, but that does not replace a clear instruction to identify and protect them (pp.30, 57).

[12] Australian Government, Department of Climate Change, Energy, the Environment and Water (2025). Assessing Australia's climate risks: National Climate Risk Assessment findings and process. https://www.dcceew.gov.au/climate-change/policy/adaptation/ncra

This matters for vegetation, waterways and habitat connections that are important locally but may not receive equivalent state or Commonwealth protection. If councils are to protect these places, the state should explicitly support them in doing so.

CAFNEC welcomes the draft's recognition of cumulative impacts and fragmentation. The policy must explain how it will prevent the steady loss of nature through many small decisions. A patch of habitat or a creek corridor can lose its value bit by bit, even where no single proposal appears significant on its own.

Recommendation 8.1: Restore a dedicated policy requiring councils to identify and protect MLES. For state and local environmental matters, require development to avoid adverse impacts first and minimise impacts that cannot reasonably be avoided. Keep this protection distinct from the separate significance tests used for Commonwealth approvals and environmental offsets.

Recommendation 8.2: State clearly that councils can provide stronger, evidence-based local protections above state minimum standards. Prevent duplicated assessment of the same matter, while allowing councils to address local values and conditions that state processes do not adequately cover.

Protecting isolated patches of habitat will not maintain healthy ecosystems. Wildlife needs connected habitat, waterways need functioning catchments, and species facing a changing climate need places where they can survive and move. Planning should identify these connections before deciding where new roads, housing, tourism or energy projects go.

The Wet Tropics adaptation plan provides a regional basis for this work.[13] The Global Biodiversity Framework also calls for planning that includes biodiversity and community participation across land and sea areas.[14]

Recommendation 8.3: Require regional plans to identify and protect connected habitat networks, important waterways and wetlands, places that can shelter species as the climate changes, and priorities for restoration. Assess the combined effects of development across council boundaries and whole catchments. In FNQ, protect connections between lowland and upland habitats, protected areas and coastal ecosystems. Monitor habitat condition and connectivity as well as the area remaining.

The draft's koala policy should also support improving habitat extent and condition wherever relevant populations occur, rather than confining its direction to South East Queensland.

[13] Wet Tropics Management Authority (2019). Accept, Act, Adapt: Climate Adaptation Plan for the Wet Tropics 2020-2030; and the Authority's current overview of the plan and implementation. https://www.wettropics.gov.au/about-us/corporate-information/plans%2C-strategies-and-agreements/climate-adaptation-plan-for-the-wet-tropics

[14] Convention on Biological Diversity (2022). Kunming-Montreal Global Biodiversity Framework, Target 1: Plan and Manage all Areas to Reduce Biodiversity Loss; official target text and explanatory material. https://www.cbd.int/gbf/targets/1

Species protection should respond to ecological need across the state, including FNQ's distinctive threatened wildlife.

Restoration must be an explicit goal. Offsets should be a last resort after impacts have been avoided and reduced. The promise of an offset cannot justify losing a place whose ecological or cultural value cannot be replaced.

9. Restore First Nations recognition and participation

The draft removes the dedicated policy on Aboriginal and Torres Strait Islander cultural heritage and replaces it with general heritage provisions. This fails to give clear recognition to living cultures, Country and the relationships between people, land and waters.

The Planning Act 2016 recognises Aboriginal and Torres Strait Islander knowledge, culture and tradition.[15] The Human Rights Act 2019 recognises distinct cultural rights, including relationships with lands, waters and resources.[16] The SPP should make these commitments visible in the decisions that shape Country.

Recommendation 9: Restore a dedicated Aboriginal and Torres Strait Islander cultural heritage policy. Require early, properly funded participation by the relevant Traditional Owners in regional plans, local schemes, hazard mapping and major development assessment. Recognise the relevant cultural heritage legislation and ensure that planning addresses cultural landscapes and living relationships with Country as well as individual sites.

Traditional Owners should help shape the options being considered from the beginning. They should control how their cultural knowledge is collected, used and shared, with sensitive information protected. Adaptation decisions, including decisions about coastal change and relocation, must respect continuing connections to Country.

The government must develop this policy with the relevant Aboriginal and Torres Strait Islander peoples and representative bodies, including Rainforest Aboriginal Peoples and communities across Cape York, the Gulf and Zenadth Kes.

10. Protect water quality and healthy catchments

The draft retains important protections for wetlands, groundwater-dependent ecosystems, receiving waters and stormwater (pp.42-43). These must remain effective as water-quality policy is combined with the broader Water interest and its stronger focus on supply infrastructure.

For the Reef, what happens on land matters. Runoff and coastal development add to the pressures on an ecosystem already under severe climate stress.[17] Clearing, earthworks, drainage and wastewater can affect waterways well beyond a development boundary. Planning must assess those effects through construction and occupation, including during heavier rainfall.

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[15] Planning Act 2016 (Qld), current in-force text checked 26 October 2026, particularly ss.3-5 and 8. https://www.legislation.qld.gov.au/view/html/inforce/current/act-2016-025

[16] Human Rights Act 2019 (Qld), current in-force text checked 26 October 2026, particularly ss.28 and 58. https://www.legislation.qld.gov.au/view/html/inforce/current/act-2019-005

[17] Great Barrier Reef Marine Park Authority (2024). Great Barrier Reef Outlook Report 2024, Executive Summary. https://outlookreport.gbrmpa.gov.au/about/executive-summary

Recommendation 10: Retain enforceable stormwater and water-quality rules, protect natural water flows and assess the combined effects of development across catchments. Uphold the objectives of the Environmental Protection (Water and Wetland Biodiversity) Policy 2019.[18] Require adequate space for water treatment, effective erosion and sediment controls, clear maintenance responsibilities and monitoring suited to the risk.

Wetlands, mangroves, floodplains and creek vegetation protect water quality, provide habitat and help reduce hazard impacts. Their value cannot be assumed to be replaced by drains or other engineering works. Development must retain these functions and account for effects on flood storage, groundwater and downstream communities under future rainfall conditions.

Water security also requires careful choices about demand. Assess new water users against reliable supply, environmental needs and future climate conditions. Prioritise efficiency, appropriate reuse and reduced demand, and properly assess alternatives before committing to new dams or diversions.

11. Deliver homes, energy and growth that serve communities

CAFNEC supports housing diversity, well-serviced land, public space and active transport. The draft's recognition of accessible and inclusive design should be retained and translated into practical requirements (p.20).

More housing will only serve communities if it is safe, well located and affordable to live in. Directing people to flood-prone or poorly serviced land can create costs that last far longer than the initial benefit of releasing that land. Higher density also needs suitable drainage, shade, open space, transport and services.

Recommendation 11.1: Direct housing to locations that are safe under future climate conditions, protect environmental and cultural values, and provide access to essential infrastructure, services and transport. Prioritise suitable infill and redevelopment with adequate canopy, drainage, open space and community facilities. Assess affordability over the life of the home, including cooling, transport, insurance and disaster costs.

The ACCC's June 2026 findings show that the cyclone reinsurance pool has helped reduce or moderate premiums in higher-risk areas, while serious affordability pressures remain.[19] Helping existing households obtain insurance must be accompanied by planning that prevents new avoidable exposure. The availability of insurance does not establish that a place is safe.

The SPP also needs a clear role in the energy transition. The draft mentions renewable energy as an emerging industry, but its Energy policies do not set an explicit renewable-transition or emissions-reduction objective (pp.21, 40-41).

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[18] Environmental Protection (Water and Wetland Biodiversity) Policy 2019 (Qld), current in-force text checked 26 October 2026. https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2019-0156

[19] Australian Competition and Consumer Commission (25 June 2026). Cyclone reinsurance pool reduces premiums in high-risk areas but affordability pressures persist. Original regulator findings accompanying its fifth insurance monitoring report. https://www.accc.gov.au/media-release/cyclone-reinsurance-pool-reduces-premiums-in-high-risk-areas-but-affordability-pressures-persist

Recommendation 11.2: Restore explicit support for appropriately located renewable energy, storage and networks. Plan projects regionally, assess their combined impacts and consider alternative locations early. Support energy efficiency, electrification and rooftop and other local energy systems, while protecting important habitat, cultural values, productive farmland and neighbouring communities.

Housing, energy and transport planning should work together to reduce household costs and emissions. Provide reliable power for essential services, support public and active transport and charging infrastructure, and avoid settlement patterns that leave residents dependent on long car trips.

Tourism and agriculture also depend on healthy land and water. Tourism development must respect ecological capacity, Traditional Owner priorities and the natural values visitors come to experience. Commercial demand alone cannot justify damaging a sensitive protected area. Protect productive farmland from fragmentation, and prevent urban and industrial development from shifting its costs onto neighbouring farms, waterways and habitat.

12. Consult on the complete assessment rules

Assessment benchmarks are the requirements used to judge development applications. CAFNEC can support moving them from the SPP into the Planning Regulation if their protections are retained and their application is clear. The concern is what the rules will require and which developments they will cover.

The assessment paper says the natural-hazard benchmarks will be revised after consultation to match the new policy. Its current draft still gives priority to avoiding hazards, while the draft SPP weakens that priority.[20] Communities are being asked to comment before the government has published a complete, consistent set of rules.

The paper also proposes applying the new benchmarks where they conflict with schemes that had incorporated the 2017 SPP. It describes state benchmarks as minimum standards and allows additional compatible local requirements (pp.4-6). Councils and communities need to know exactly how these changes will affect existing protections.

Recommendation 12: Publish the complete revised assessment rules and explain each change from the current requirements, including which developments they cover. Consult again on substantive changes, particularly the natural hazard benchmarks. Bring the new SPP and supporting rules into effect together, with no gap or reduction in protection.

Explain what happens to existing planning schemes, applications already underway, changes to approvals and development that does not require an application. Show how stormwater requirements, coastal restrictions and protection of natural hazard buffers will be retained. Publish the technical standards that apply and explain how they will be updated. A strong

[20] Queensland Government (2026). State Planning Policy 2017 Review: The future of assessment benchmarks. pp.3-6, Table 4 pp.9-10 and Table 6 pp.13-18. Proposed provisions are not current assessment requirements. https://www.planning.qld.gov.au/__data/assets/pdf_file/0020/116660/the-future-of-assessment-benchmarks.pdf

requirement on paper achieves little if the development affecting a place is never assessed against it.

13. Make maps and implementation work for communities

CAFNEC supports common methods, accessible maps and state minimum standards. Local knowledge and detailed studies must also inform decisions. The draft allows some local map refinement but says statutory maps in the state's Integrated Mapping System (IMS) take priority over locally refined maps (p.11). The government needs to explain how better local evidence can be recognised.

Recommendation 13.1: Set minimum standards for hazard mapping, climate assumptions, data quality and public access. Provide a clear process for councils to use validated local studies and stronger local protections. Missing or incomplete mapping must not be treated as proof that an area is safe.

Provide a shared public mapping service that shows when information changed, why it changed and what it means for planning. Explain the difference between a hazard being present and the resulting danger to people. Allow evidence-based corrections and independent review of significant disputes. People should be able to challenge an error, but the existence of a hazard cannot depend on whether a landowner agrees with it.

Recommendation 13.2: Fund catchment studies and regular updates, with priority reviews after major events, substantial new development or important changes in scientific information. Include heat alongside flood, coastal and other hazards. Give smaller, remote and Aboriginal and Torres Strait Islander councils sustained access to specialist support.

The MGR changes would make it easier for councils to adopt state hazard maps without altering them, relying on consultation already undertaken by the state. The fact sheet also acknowledges that councils using this route could face compensation claims.[21] Faster updating will achieve little if councils cannot afford the financial risk of using it.

Recommendation 13.3: Resolve councils' compensation exposure before introducing the expanded mapping pathway. Provide state funding or share the financial risk, and retain a workable route for councils to use existing legal exemptions from compensation. Require completed, accessible consultation that explains both the hazard information and the planning restrictions that follow.

Consultation must reach renters, Traditional Owners, businesses and neighbouring communities, as well as property owners. People affected by downstream flooding or evacuation pressures also have a stake in the outcome.

[21] Queensland Government (2026). Minister's Guidelines and Rules fact sheet, particularly pp.2-3. https://www.planning.qld.gov.au/__data/assets/pdf_file/0025/116665/ministers-guidelines-and-rules-info-fact-sheet.pdf

The amended MGR still requires climate change projections in the relevant local flood studies.[22] Keep that requirement and make the whole planning package consistent with it.

Recommendation 13.4: Publish clear responsibilities, funding and start dates, including which policy applies to work already underway. Involve communities early and explain how their feedback changed decisions. Keep urgent planning protections available where serious risks require action, with published reasons and timely review.

The changeover must not lock councils into outdated hazard information or force them to remove stronger lawful protections. State policy, regional plans, coastal adaptation strategies and local schemes should reinforce one another.

14. Measure results and hold government accountable

Queenslanders need to know whether this policy is delivering safer communities and a healthier environment. Counting approvals or land released will not answer that question. The government should track whether new development increases hazard exposure, whether habitat and water quality are protected, and whether homes are affordable to occupy over time.

Recommendation 14: Publish regular results on community safety, heat exposure, habitat condition and connections, water quality, housing costs, infrastructure reliability and public participation. Report how outcomes differ for disadvantaged communities and First Nations peoples. Explain where the policy is failing and revise it when protections are inadequate.

For FNQ, the test is practical: safer homes, healthy catchments, connected habitats, respected cultures and communities prepared for climate change. The government should revise the SPP to make those outcomes central to Queensland's future.

[22] Queensland Government (2026). Draft amended Minister's Guidelines and Rules, Version 3.1, particularly Schedule 1, pp.69-71 and Schedule 3, p.74. Available through the official MGR consultation page: https://www.planning.qld.gov.au/planning-framework/plan-making/state-planning/ministers-guidelines-and-rules