WHITSUNDAY CONSERVATION COUNCIL

Caring for the future is in our nature

SUBMISSION
to
WHITSUNDAY REGIONAL COUNCIL

MATTERS OF LOCAL ENVIRONMENTAL SIGNIFICANCE (MLES)

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WHITSUNDAY CONSERVATION COUNCIL

Caring for the future is in our nature

Whitsunday Conservation Council formal response
Matters of Local Environmental Significance (MLES) – Whitsunday Regional Council Local Planning Scheme

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The Whitsunday Conservation Council (WCC) respectfully submits the following response to the information presented at the 14 July 2021 meeting, undertaken by Whitsunday Regional Council (WRC). We would like to thank you for the opportunity to comment and for your patience with the delayed response; it has taken our group some time to 'come to grips' with the scale and complexity of this task.

Introduction

Our local environment provides for an enviable quality of life for those privileged to live here. Long term residents have, however, seen the significant losses of amenity and opportunity that 50 years of boom and bust development cycles have wrought, and are alarmed by:

- the ongoing and seemingly indiscriminate loss of natural habitats with no plan for retaining buffers, wildlife movement corridors or retention of natural habitats
- the long-held attitude that it is acceptable to demolish established natural habitat and then 'reinstall' it with grant-funded community revegetation projects and consider it to be 'fixed'. Even the very best revegetated areas will take many decades to provide equivalent ecosystem services and resources for wildlife, if they ever do.
- the 'scorched earth' approach to housing developments which involves the total removal of all vegetation and topsoil, leaving sites vulnerable to erosion and weed invasion
- the high density of urban development permitted under the planning scheme, with building footprints that leave no space for plants/ water infiltration/urban tree canopy.
- the unmanaged boom & bust cycle driving the ongoing erosion of natural assets and public amenity
- the failure to budget sufficient resources or employ specialist staff to maintain our natural assets
- the token nature of public consultation efforts since Council amalgamation: a 5 question survey on a website is not sufficient consultation for major changes to the local planning scheme or for major developments

The future we all face is a precarious and dynamic one. The impacts of climate change will continue to present challenges for our local communities at many levels. The region's high dependence on tourism, the building industry & agriculture, has been made glaringly obvious in the past 2 years. These industries have direct & substantial dependence on, as well as impacts on, the natural environment. It must be said that in the past, the local community has been 'consulted' with widely, thoroughly and over a long period of time. In each of the resulting documents there have been a consistent set of values (MLES) expressed, and preservation of the natural environment tops the list.

WRC residents already face high rates and increasingly high insurance costs to live in our region. WRC should be doing all it can to mitigate the future costs to the community associated with rectification works, and potential legal liability for approval of developments if they are not designed to minimize known risk of natural disasters.

It is Council's responsibility to manage development within the context of the various planning schemes; but in essence Council's responsibility is to manage the environment, both built & natural, as assets for the benefit of all of those that will live here, including future generations.

As a tourism destination, the most valuable asset this region has is its natural beauty, in the form of unique undisturbed natural landscapes, native habitats and the biodiversity of flora and fauna. The Queensland State Planning Policy 2017 (QSPP 2017) recognises that if we want a strong tourism industry, we need to protect our natural assets.

The QSPP 2017 also requires that Council implement protections for biodiversity, coastal environments, cultural heritage and water quality into its planning scheme.

The QSPP 2017 states that:
'Planning has a critical role to play in supporting the protection of our environment and heritage for current and future generations.'

Whitsunday Conservation Council (WCC) submits that it is the responsibility of the WRC to develop a comprehensive hierarchy of regulatory development controls, as part of the local planning scheme (LPS), that contribute to the preservation of a physical landscape that supports a high quality of life for all that reside here.

The LPS should have as its core value the preservation of the very things that draw people to the region:

- the unique natural scenic beauty of the landscape
- the diverse range of habitats supporting a diversity of flora & fauna, including a significant number of species which are endemic to this locality.
- intact, healthy, connected natural habitats that enable native wildlife and ecosystems to survive and function and move to survive as the climate changes
- keystone species which are critical to maintaining healthy habitats,
- the coastal waters, undeveloped natural shorelines, coral reefs, mangrove forests, seagrass meadows and connectivity to the islands
- the productivity of local industries such as tourism, fishing and agriculture which depend on healthy functioning ecosystem services
- the healthy waterways which support the diverse inshore marine environment, as well as recreational and commercial fishing
- the spectacular view corridors of natural land and seascapes, dominated by natural features.
- the small population densities & regional lifestyle, with easy direct access to undeveloped natural areas for recreation and mental health
- clean, unpolluted air and water, not to be taken for granted.

'Queensland is one of the most biologically diverse places on earth, home to a complex and varied coastal environment with outstanding natural values. The natural and built environments of Queensland also have international, national, state and local heritage significance. The recognition of these significant places strengthens the understanding of our environment, history and culture.' A quote from the QSPP 2017.

***Local Government is responsible for protecting the natural assets that matter locally*.**

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MLES that should be included in the Local Planning Scheme

WCC supports the inclusion of the MLES that were identified at the 2021 community consultation undertaken by WRC into the existing GIS environmental significance overlays and/or waterways and wetlands overlay.

In addition, GIS overlays should be developed to include the following MLES are critical to the character and liveability of the region (discussed in more detail on page 21):

1. MLES - Sites of significance to Traditional Owners
2. MLES – Habitats and environmental corridors
3. MLES – Fauna and Flora
4. MLES – Risk from Climate Change
5. MLES – Tree canopy: Mitigation of Urban heat retention
6. MLES - Urban Parks: Human Health & Wellbeing
7. MLES – Urban woodlands and mature trees
8. MLES - Ridgelines and high slopes of hillsides

In order to fulfil its responsibility to protect MLES, the WRC needs to:

- prioritise the protection of all Matters of Environmental Significance - Federal (MNES) State (MSES) , Local (MLES) that remain within the whole Local Government Area (LGA)
- identify and map all MLES within the Council area and use this mapping to protect MLES when assessing development applications under the LPS
- be proactive in protecting MLES by identifying the values to be protected, and applying measures such as wildlife corridors, buffers and green space areas to protect them, as well as identifying areas for future habitat restoration.
- ensure that developments first and foremost are designed to adapt to the local environment and to accommodate the protection of all Matters of Environmental Significance - Federal, State & Local.
- Include in the LPS clear criteria for development assessments that ensure that the inherent and intrinsic values of the MLES are protected.
- Minimise the use of offsets, as they are problematic. Offsets should be strictly regulated and should only be the last resort in negotiating approval for a project. The qualitative values applied to the negotiation of offsets should be a “like for better” ONLY equation. The proposed offset must be assessed against a clearly stated set of criteria to ensure that it makes a meaningful contribution to the conservation of equivalent habitat and amenity. There also must be clear, enforceable conditions that ensure that offsets are fully implemented as described and have a funded, long-term plan for their management/ protection. In practice this rarely happens, which is why they should be avoided.
- WRC should be managing public owned land as a Land Bank, held in trust for future generations. There should also be a land buyback policy targeting areas that are unsuited to development. WRC should actively look for opportunities to buy strategic blocks of land as they become available to enhance/ complement existing vegetated & protected areas and ensure habitat connectivity.

Measures that Council should implement to protect/ preserve and enhance MLES:

- completing the identification and spatial mapping of the biodiversity condition of the lands they and the State manage in the region, including the remnant vegetation within the current urban development footprints. Areas for preservation & enhancement should then be identified and actions planned and prioritised. This information must be made publicly available.

- reinstating the 'Biodiversity Levy' in the annual rates: this provided a valuable source of funds to employ specialist environmental management staff & for projects. Environmental management cannot be just put off until a grant becomes available. Failure to manage the proliferation of Leucaeana and Indian mynahs for example should not be happening. Council has 'dropped the ball'.

- Establishing trees of the same species in a suitable location nearby to where mature habitat trees are removed, e.g. as street trees/ or in reserves, as well as suitable, correctly installed nest boxes where trees with hollows are at best pruned, at worst removed.

- Making it Council policy for tree removal contractors/ Council employees to involve local wildlife rescue volunteers during removal of mature trees to avoid unnecessary deaths/ suffering of native species.

- Committing the Parks & Garden Section to establishing a specialist, qualified Bush Regeneration Team to implement management of natural areas using established techniques that enhance and preserve the quality of the native habitat.

- Engaging with and supporting local community groups to adopt their local bushland reserves to undertake on-ground nature rehabilitation activities.

    - Adopting a policy of planting of local native plants species in public amenity landscapes and the rehabilitation of urban green spaces, including replanting of trees that have been lost due to storms/ natural aging.
    - Promote the planting of local native plants such as sponsoring the local Landcare Nursery to provide annual native plant promotions for rate payers and new residents;
    - Creating a regional motto like "city in a garden" etc. Otherwise, there will be little to no "point of difference" that gives the Whitsundays its "sense of place", its character and protects its biodiversity.

"In 2017, 22 researchers from 13 different institutions participated in a study to determine the total number of living species, including bacteria, algae, fungi, lichens, invertebrates, wildlife, and plant life, that depend on a single average tree. The research team was supported by a National Science Foundation grant. The study was published as a paper called "Synthesis of phylogeny and taxonomy into a comprehensive tree of life." ***It was discovered that a total of 2.3 million living species depend on a single average tree.*** *However, the study did not provide a breakdown by species."*
https://pubmed.ncbi.nlm.nih.gov/26385966/

The WRC Local Planning Scheme (LPS): What needs protection?

As a tourism destination, the most valuable asset this region has is its natural beauty, in the form of unique natural landscapes, native habitats and biodiversity of flora and fauna. The Queensland State Planning Policy 2017 (QSPP 2017) recognises that if we want a strong tourism industry, we need to protect our natural assets.

The QSPP 2017 also requires that Council implement protections for biodiversity, coastal environments, cultural heritage and water quality into its planning scheme.

The Whitsunday Council area covers 23,831.4 square kilometres and only about 4% of that area is protected in conservation reserves. Compared to Mackay with 14.14%, and nationally 19.75%.

The amalgamation of Proserpine and Bowen Shire Councils and adoption of the 2017 Whitsunday Planning Scheme resulted in the removal of existing environmental protections and programs that existed under previous Councils. This left important local environmental values, landscapes and areas of land unprotected by local planning policy.

WRC has had 8 years to develop and implement protection for MLES in the Local Planning Scheme (LPS), yet it has not.

This has left MLES unprotected for 8 years, and we have lost a lot of natural assets, precious significant trees and visual amenity as a result. No doubt we will regret the lost opportunities to have more sustainable, climate adapted and well-designed developments for much longer. This has not gone unnoticed.

If well managed, our natural assets will continue to support our livelihoods, inspire us and provide all of the ecosystem services that we take for granted: clean air, water, food, natural beauty. As the population grows, these things cannot be taken for granted: poor planning and management of development threatens to degrade or destroy the very things that draw people here and enable them to stay and live a healthy, happy life.

We are at a critical point right now, much of our natural wealth has already been lost or degraded, but much still remains to be protected/ restored.

*"Dead trees provide shelter to over 1,000 species of wildlife, including salamanders, ants, beetles, snails, chipmunks and squirrels." https://pubmed.ncbi.nlm.nih.gov/26385966/ *while there is no comparative research on Australian trees, we can safely assume something similar**

"Dead trees can still provide a valuable habitat service, because they often contain hollows that suit a variety of birds, mammals and even insects. Veteran trees with natural hollows are always the best, but with a little expert help, younger trees that have given up the ghost before their time can also house wildlife." https://www.canopykeepers.org.au/dead-trees-live-on/

THE LOCAL PLANNING SCHEME MUST PROTECT THE VALUES – THE MLES – THAT ATTRACT PEOPLE TO LIVE & INVEST HERE

In order to maintain the natural assets, liveability and tourism appeal of the Whitsunday region, the LPS should have as its core value the preservation of the very things – the MLES - that draw people to the region:

- the unique natural scenic beauty of the landscape: the vegetated rural landscapes, undeveloped coastlines, mountain ranges, riparian corridors, natural shorelines, hillsides, ridgelines and escarpments

- the diverse range of habitats supporting a diversity of flora & fauna, including a significant number of species which are endemic to this locality.

- intact, healthy, connected natural habitats that enable native wildlife and ecosystems to survive and function and move to survive as the climate changes

- keystone species which are critical to maintaining healthy habitats, such as bandicoots, which disperse soil fungi essential to plant health, and create holes where trees can germinate, or fruits bats, which are essential pollinators and dispersers of numerous tree species.

- the coastal waters, undeveloped natural shorelines, coral reefs, mangrove forests, seagrass meadows and connectivity to the islands

- the productivity of local industries such as tourism, fishing and agriculture which depend on ecosystem services such as clean air, water, habitat for beneficial species (including the 'good bugs': beneficial insects) and healthy soils

- the healthy waterways which support the diverse inshore marine environment, as well as recreational and commercial fishing

- the spectacular view corridors of natural land and seascapes, dominated by natural features.

- the small population densities & regional lifestyle, with easy direct access to undeveloped natural areas for recreation and mental health

- clean, unpolluted air and water, not to be taken for granted

The QSPP 2017 states that:
'Planning has a critical role to play in supporting the protection of our environment and heritage for current and future generations.'

Whitsunday Conservation Council (WCC) submits that it is the responsibility of the WRC to develop a comprehensive hierarchy of regulatory development controls, as part of the local planning scheme (LPS), that contribute to the preservation of a physical landscape that supports a high quality of life for all that reside here, and will ensure that:

- the development that does occur is genuinely environmentally sustainable, by developing and including overlays of MLES in the approvals process to enable their protection at the planning stages of projects
- development is designed and planned to mitigate the impacts of climate change, including water sensitive urban design (WSUD) and maximises vegetated areas to decrease urban heat retention
- developments have minimal negative environmental impacts on water quality through implementation of best practice erosion control measures during development and use of WSUD in the design of projects
- the visual amenity of the area which attracts people to live and holiday here is protected and not degraded by visually intrusive or poorly designed developments
- Where vegetation must be removed, protocols are in place to ensure that wildlife carers/ catchers are present during the clearing process to prevent injury/ death of native animals
- Tree/ vegetation protection policies are developed and implemented to ensure that trees are not removed unnecessarily, and that significant/ established trees are retained as much as possible for their ecosystem services. Replanting does not replace like with like: it is many decades before the replanted trees have the same value for habitat and cooling.
- To back up the planning scheme, WRC needs to be pro-active about educating the community about the value and benefits of retaining and protecting native flora, fauna and habitat and the ecosystem services that they provide. The now abandoned Biodiversity Levy funded a range of community education projects about weeds, local native habitats and wildlife, water quality and much more. Council also needs to 'walk the talk': at present it is a case of 'take our advice, as we are not using it'. Council must model the responsible behaviour itself, which means they must implement good land management practices, weed control, biosecurity, herbicide usage and retention/ management of native vegetation within Council managed areas. This also means ensuring that they have staff with relevant qualifications overseeing what is being done, rather than just farming out the responsibility to contractors.
- The implementation of the planning scheme must have at its core the values of transparency, social justice, access, equity and fairness to all members of the community. The rules should be applied equally whether it is a single suburban house or a multi-million dollar development; there should be no shortcuts or exceptions or special treatment for anyone or entity.

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NOW IS THE TIME TO GET THIS RIGHT

The future we all face is a precarious and dynamic one. The impacts of climate change will continue to present challenges for our local communities at many levels. The region's high dependence on tourism, the building industry & agriculture, has been made glaringly obvious in the past 2 years. These industries have direct & substantial dependence on, as well as impacts on, the natural environment.

The physical remoteness and the vulnerabilities of our supply chains of both people & goods, to & within our region have also been made clear by recent natural disasters and reinforced by the Covid-19 pandemic.

WCC believes that this is an opportune time to look at the full impacts and drivers of continued growth within our communities and ask how much development can be sustained without the significant loss of the very values & attributes that attract people to live, work and holiday in the region.

There is a natural carrying capacity in tourism destinations, beyond which the majority of people begin to feel that it is 'too crowded', 'overdeveloped', or 'spoiled'. This is subjective and often can only be seen after it is too late: tourism can 'kill the golden goose' if not constrained: once the critical point is reached the nature of the attraction is changed, forever. There is an opportunity cost here, as it becomes harder to attract demographics who value the natural environment in their tourism experience, resulting in a downward spiral in the value of the destination and in the margins that operators can charge for their tourism products.

The value of the natural environment in tourist visitation should not be underestimated. The Tourism and Events Queensland Annual Consumer Demand Project interviews international visitors about the most important values that attract them to visit Queensland. Due to Covid-19, the last one was in 2019. They surveyed visitors from China, Germany, India, Indonesia, Japan, Malaysia, New Zealand, Singapore, South Korea, UK, USA and Hong Kong. Across these main groups of international visitors, 48.9% rated 'world class natural beauty and wildlife' as one of their 'top 5 importance factors' in choosing Queensland.

To put this into perspective, 54.58% of these visitors rated 'a safe and secure destination' as a 'top 5 importance factor' for choosing Queensland.

This suggests that the unique, undisturbed natural environment is a very important drawcard for international visitors to Queensland; almost as important as their personal safety.

https://teq.queensland.com/research-and-insights/international-research/international-market-research/consumer-demand-project

An interesting case study is Kangaroo Island, where they have benefitted from managing tourism to protection the values that people there in the first place using a system called the Tourism Optimisation Management Model (TOMM)

https://smatourism.com/projects/tourism-optimisation-management-model-for-kangaroo-island/

http://www.utok.cz/sites/default/files/data/USERS/u28/TOMM%20Tourism%20optimisation%20management%20model.pdf

The model uses annual surveys of visitors and locals, which have been developed by social scientists, to assess the impacts of tourism on key aspects of the quality of life for both the visitors and the local residents.

The survey questions assess the health of a pre-defined set of indicators which have been identified as critical to maintaining the value of the destination in previous studies, such as environmental values, visual appearance, quality of the experience, liveability indicators etc.

The ratings given to these key indicators by visitors and residents are used to manage tourism below the 'carrying capacity', to protect the tourism assets/ experience as well as the quality of the lifestyle for the locals.

We need to look ahead and preserve as much of our natural assets as we can, and there needs to be consideration of what we are losing as well as what we are gaining whenever a development is considered.

A system similar to the TOMM could be implemented to protect the future of vital assets that make the Whitsundays so attractive to visitors and residents.

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The shortcomings of the current Planning Scheme with respect to MLES

The current planning scheme fails to adequately address local MLES as required in the SPP 2017. The most recent urban developments in the Cannonvale, Proserpine, Bowen & Collinsville areas demonstrate these shortcomings in the current local planning scheme's ability to regulate the protection of Matters of Local Environmental Significance (MLES).

Of notable reference is the example of the Whitsunday Lakes Development, in Cannonvale. The approved small lot sizes and & large lot yield has resulted in significant housing density, property frontages with little room for gardens & street trees and narrow streets lined with overflow vehicle parking. Dark coloured roofs/ pavers/ concrete, all impact negatively on the local microclimate, storm-water runoff, and the local environment through loss of natural habitats. In particular this kind of development adds to the retention of heat due to the large areas or dark, hard surfaces and to the volume of rainwater runoff due to the dominance of hard surfaces and lack of rainwater/ harvesting/ infiltration. The developer left degraded/ damaged riparian corridors & poor quality community open space. As is usual, the cost of the rectification works has been foisted onto the public purse via government grants, implemented by local community environment groups.

The boom and bust cycles of local development that have occurred in the last 40 years within this LGA have wrought significant changes to the physical landscape, many of which could have been done better or better avoided altogether. The opportunities lost forever to do 'something better' and the visual, environmental, and planning impacts of these developments stay with us long after the developers have moved on.

There is also an opportunity cost associated with poor planning decisions; we should be looking for the best project, not just the first in the door. The region is unique and beautiful, and we should be looking for quality projects that enhance the attractiveness of the region as well as giving back to the environment and community.

Our LGA has a history of accommodating development proposals regardless of quality – the "monument to mediocrity" as Queensland tourism pioneer Sir Frank Moore once referred to the Whitsundays. This approach no doubt marks WRC out as a planning 'soft touch' and does not encourage high-quality, reputable developers to operate in the region.
It has also left us with a litany of failed projects which have left the local community to clean up their mess, e.g. Laguna Quays, the Ansett land reclamation site which resulted in the unstable and unsightly cutting on Shute Harbour Road near Abell Point; the Port of Airlie Marina & associated development in long term receivership to name just a few.

It is the nature of entrepreneurs & developers to push the envelope of what is permitted by planning schemes. Time and time again we have witnessed (failed) developers who have come to town with big promises if only they can do a deal on the planning regulations & codes. This usually means a loss – financial & environmental. The community pays either way. It is time to ensure that Matters of Local Significance are afforded greater value in an approval process that respects and protects them. While we still can.

The problem with offsets – what NOT to do in the context of MLES:

Whitsunday Conservation Council (WCC) has particular concerns about the policy/ procedure that will apply to development applications with regard to offsets, the criteria that will be applied in the negotiations and the value equation between the loss of MLES & the "accepted" offset.

WCC concerns relate specifically to:

- the loss of the visual character and of the unique Whitsundays "sense of place" as urbanisation increases, particularly the loss of natural vistas, local native plants, habitats and the wildlife that depends upon them. We should be protecting and presenting the best of the Whitsundays to visitors and future residents, not trying to be a second-rate version of somewhere else.

- The effectiveness and enforceability of some offset measures. Covenants that are placed over lands for the protection of native plants & animals need to be actively monitored and enforced to ensure that they have the intended protective value over the long term. There are existing examples in our Council area of covenants that were placed on development areas as part of the approval process, intended to protect Proserpine Rock wallaby habitat and protected tree species using vegetation clearing & domestic animal prohibitions. In practice these are not actively monitored or enforced by WRC and the impacts on wildlife and vegetation continue unabated.

- The longevity of offset measures. Once developments are completed and are 'handed over' to Council and the individual property owners, environmental conditions such as buffer plantings, riparian corridors and parkland vegetation currently have no protection at all. The result is often piecemeal (or even wholesale) loss over time. This represents a waste of the money and effort that went into protecting/ establishing them and negates any benefit that may have been intended for the environment and community. It also sends the message that these measures are not important.

- In light of the above, the use of offsets in the planning approval process should be a genuine last resort. The expert on offsets is Martine Maron who has published on this subject: Maron, M., Gordon, A., Mackey, B. *et al.* Conservation: Stop misuse of biodiversity offsets. *Nature* **523**, 401–403 (2015). https://doi.org/10.1038/523401a. In theory, biodiversity offsets should be such a costly option that the developer will want to avoid projects where they are required. In practice, that only applies to small sized developers and not to those with plenty of money and resources to cover the costs.

- Offsets frequently fail to deliver environmental benefits; they are too often not completed as promised, are poorly designed/ implemented, lack a plan for protection over the long term, or they do not adequately compensate for the magnitude of the value of what has been lost.

- An intact, functioning ecological community cannot be easily 'rebuilt' once it is gone, even by experts, no matter how much money/ time is spent. A complex, mature native habitat will not be successfully offset if the solution is designed and implemented by someone who is not qualified/ experienced and genuinely motivated!

WCC believes that is far better, environmentally & economically, to protect and enhance existing MLES, than to seek its replacement. If they are not very well planned, implemented and maintained to maturity, offsets do not mitigate a loss of established biodiversity and habitat. The public is then left to fund the management of degraded vegetation communities and the weed, pest, water quality and fire problems that they pose.

The qualitative values applied to the negotiation of offsets should be a "like for better" ONLY equation. That is, as a minimum standard:

- If the MSES, MFES & MLES cannot be demonstrably replaced using an established and accepted current methodology that is known to be effective in our region and climate, then no offset should be granted.
- Offsets should be the last resort. The offset process should not be a cheap & easy compromise that enables development at the expense of the environment and the quality of life of those who live here now and in the future.
- The "Sense of Place" that is so important for the mental health and cohesion of the community must be preserved.
- If an offset is considered, the MLES must be adequately replaced and enhanced, and a long term commitment must be made to the professional re-establishment/ management/ preservation of the lost MLES, such as retained habitat or significant trees. This must be an enduring, enforceable requirement of the approval of the proposed development.
- If offsets are granted, there must be a guarantee in place (legal and financial) that they are fully funded and professionally managed/ maintained in perpetuity, not just during the development. Protection of the offset must extend beyond the development 'hand-over' stage to ensure that the offset is completed and protected long after the developer has 'moved on'.

- Protected areas such as nature refuges <u>should never be considered to be offsets</u> as they are already required to be protected under the International Convention of Biological Diversity.

- Protection of locally significant wildlife corridors and riparian areas are as important as the shorebird habitats on the coast. The approach should be one of long-term overall planning and management to ensure what remains is preserved in a healthy state.

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WRC needs to complete an inventory & condition report on our local natural assets so that they can be protected and enhanced for the long term

In some cases, LMES areas are not currently in great biological condition due to historical impacts, or they have become degraded due to the development process. Often by the time the project is completed, nothing remains.

Mapping and identifying areas of vegetation for retention at the design stage and making this a condition of the development would ensure that something was left to restore.

Proposed developments should be required to professionally rehabilitate these areas, promoting and supporting community involvement in caring for them, as part of the development approval. Only qualified specialists should be engaged to rehabilitate natural areas: there has been a history in the LGA of 'revegetation' done by non-specialist contractors, these projects usually fail due to poor implementation/ maintenance and a failure to use local provenance plants. Frequently all that is left is weeds, or perhaps a few isolated trees which are lost to attrition.

It is a truism that 'if you can't map it and measure it, then you can't manage it.' It is therefore strongly recommended that Council carry out biodiversity condition assessments for the lands that they and the state manage in the region. This information could then be used in the development planning and approval process.

It is Council's responsibility to manage development within the context of the various planning schemes, but in essence Council's responsibility is to manage the environment, both built & natural, as assets for the benefit of all of those that will live here, including future generations.

There has been a tendency in this LGA for Councils to move heaven and earth to facilitate projects which have questionable local benefit for the community, in order to appear 'investor friendly'. This is all very well but the Council should be looking first at the quality of the development and the proponents, and the potential impacts of the development on the tourism destination as a whole and on quality of life (and expenses) for ratepayers, rather than cheerleading for every project that comes along regardless of its quality.

The Whitsundays is a world class tourism destination and deserves better than the lowest common denominator.

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Addressing loss of MLES biodiversity and habitat due to urbanisation & industrialisation

The QSPP 2017 recognises that: *'Biodiversity, including plants, animals and the ecosystems of which they are a part, is integral to achieving healthy and liveable communities. Clean air, fertile soils, fresh water, food, and energy are just some examples of the benefits the natural environment provides. Biodiversity conservation also provides protection from natural hazards such as flooding and landslides.'*

Loss of biodiversity and habitat due to urbanisation & industrialisation could be more efficiently addressed by the LPS (Local Planning Scheme or Town Plan) requiring:

- new urban development proposals to be considered in the context of the surrounding landscape values and developments adjoining them. Development approvals should only be granted after holistic consideration of environmental impacts has been made. Development proposals that involve a loss of MLES should be required to provide an independent report that identifies and quantifies the impacts on surrounding natural values, as well as within the development site. This report should inform Council on whether or not to proceed or modify a proposal.
- all new development proposals must respect existing riparian corridors and significant habitats by measures such as: adjustment of lot layout & yield and increased development setbacks or covenant areas to ensure that the inherent values of the MLES are protected in areas that are of sufficient size to be viable & sustainable into the future.
- proposed development costs associated with the protection of MLES or approved offsets should be 100% financially bonded with Council as part of the fees & charges made in the approval process. These fees should cover the cost of implementing to full establishment, all of the approved landscape & environmental plans submitted with the development proposal.
- remnant native plants be retained within development sites as much as possible (especially mature trees 250cm in girth or larger) or re-vegetated as a condition of the development approvals. This should be a progressive landscape inspection process similar to the structural building approval process. Council should require native habitats be preserved as much as possible or re-established/ rehabilitated using local provenance native plants as a major part of any development approval. This should include control of recognised environmental and declared weed species. (For example current development on Mangrove Rd that re-configured a watercourse and seeded it with now flourishing Leucaena weed trees).
- developer costs associated with public open space & streetscape approved plans should be bonded as an approval condition and used by Council to undertake the implementation of the approved public landscape development plans, at the completion of an advanced stage of the lot development.
- developers should be required to make financial contributions that are allocated to the ongoing maintenance of the MLES, remnant vegetation and riparian corridors.

Measures that Council should implement to protect, preserve and enhance MLES:

- completing the identification and spatial mapping of the biodiversity condition of the lands they and the State manage in the region, including the remnant vegetation within the current urban development footprints. Areas for preservation & enhancement should then be identified and actions planned and prioritised. This information must be made publicly available.
- Reinstate the 'Biodiversity Levy in the annual rates: this provided a valuable source of funds to employ specialist environmental management staff and programs. Environmental management cannot be just put off until a grant becomes available.
- where mature habitat trees are removed, especially those that provide feeding/ nesting habitat for wildlife, it should be Council policy to establish plantings of the same species in a suitable location nearby e.g. as street trees/ or in reserves
- tree removal contractors/ Council employees must be required to employ local wildlife spotter/catchers before removal of mature habitat trees to avoid unnecessary deaths/ suffering of native species
- committing the Parks & Garden Section to establishing a specialist, qualified Bush Regeneration Team to implement management of these areas using established techniques that enhance and preserve the quality of the native habitat.
- engaging with and supporting Local community groups to adopt their local bushland reserves to undertake on-ground nature rehabilitation activities.
- implement the planting of local native plants species in public amenity landscapes; rehabilitation of urban green spaces including replanting of trees that have been lost due to storms/ natural aging.
- promote the planting of local native plants such as sponsoring the local Landcare Nursery to provide annual native plant promotions for rate payers and new residents;
- having a regional motto like "city in a garden" etc. Otherwise, there will be little to no "point of difference" that gives the Whitsundays its "sense of place" and protects its biodiversity.

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MLES FOR INCLUSION IN THE LOCAL PLANNING SCHEME:
New overlays should be developed that include the following MLES:

1. **MLES - Traditional Owners:**

- Matters of local environmental significance to Traditional Owners should be identified through the correct processes and protected where culturally appropriate. GIS overlays mapping must be developed as requested.

2. **MLES - Wildlife habitats and enhanced habitat connectivity/corridors to mitigate habitat loss and impacts from climate change**

- The region is home to a diverse range of habitats, regional ecosystems and landforms and lies in a zone of overlapping bioregions. We also note that the region's biodiversity has not been comprehensively scientifically surveyed, and that it is likely that there are species present which have not been formally recorded. This makes it important not to accept desktop surveys which rely on published lists of species; professional on-the-ground flora and fauna surveys and consultation with local flora/ fauna experts should also be carried out when assessing the biodiversity of an area.

- The uniqueness of the region's small-scale diversity of habitats and landforms should be reflected in high-resolution mapping of areas zoned for future development. This mapping should identify priority areas of MLES such as intact areas of habitat for protection, riparian corridors, wetlands and road reserves for retention as flora & fauna corridors which will be critical for the survival of species and will also protect natural areas for public amenity. This should include safe road crossings for wildlife.

- Riparian corridors should be retained as MLES and protected from development to protect water quality, maintain habitat connectivity for flora and fauna in a warming climate and provide ecosystem services including cooling and provide access to natural areas for people.

  Setbacks along creek-lines should be sufficient to maintain a viable riparian MLES vegetation community without major weed incursions and degradation from other such events as fire and cyclones.

- Council should include the environment in their disaster recovery plans to enable them to apply for funding for the rehabilitation of severely impacted MLES. Restoration of degraded riparian communities must include native understory species to retain soil on creek banks: indiscriminate herbicide spraying of banks must be phased out and dense plantings of species such as Lomandra spp. and Dianella sp. established in its place. If done properly, investment in efforts like this will reduce bank erosion and dramatically reduce herbicide usage over the long term.

- Busy main roads form a barrier that prevents the dispersal and migration of wildlife, often lethally. This leads to a gradual loss of genetic diversity and local extinctions and prevents species moving to adapt to climate change impacts. This impact will only increase, unless provision for wildlife to cross is designed into the planning from the outset. Queensland Transport and Main Roads have trailed wildlife crossings of various kinds in SE Queensland and at Cardwell Range, https://www.unisq.edu.au/news/2021/04/wildlife-crossing.

  Some of these may be relatively easy to implement as roads are upgraded, such as wildlife-friendly under-road culverts in strategic positions near remnant habitat. The risk of car accidents due to incidents with wildlife on the road would also be reduced.

- Current Council management practices undertaken in Council managed road reserves focus on driver safety, and infrastructure. Council needs to broaden the role and skillset of their Parks & Gardens department to incorporate natural resource management and bush regeneration specialists to enable roadsides to be made safe for people and wildlife. Staff recruitment should prioritise skills and expertise in environmental management and knowledge of our local habitats and species.

3. MLES –- Fauna & Flora Local Habitat retention

The likelihood of the potential loss of local endemic and keystone wildlife species is very real when considering the impacts of climate change and the ongoing pressures of urban & industrial development where MLES are not retrained. For example: flying foxes begin to die from heat stress when their ambient temperature reaches 42C degrees. Hundreds if not thousands can die in a single heat event, so given these species are critical for pollination and dispersal of rainforest trees and it is unclear whether our famous “green backdrop” forests can survive long term without them. Broadscale and sensitive areas coastal development on the Whitsunday Coast is removing Flying Fox colony and bird breeding/feeding ranges and habitat corridors.

It is vital that Council identify strategic areas adjacent & within new subdivisions for the retention of MLES remnant vegetation communities and ongoing planting required for re-establishing vegetation communities within already developed areas, as transpiration by trees and plants assists in decreasing the heat retention effects.

Mature riparian communities must be protected as MLES as they play a critical role in maintaining local water quality and wildlife corridors. Removal of these communities to enable the 're-engineering' of waterways into drains, means the loss of their cooling effects and loss of the filtration that they provided which impacts on inshore water quality. This exposes the inshore marine environment to massive influxes of sediment and rubbish during rainfall events. This is an outdated practice which should be consigned to history. Re-establishment of these communities where they have been removed should be a priority.

4. MLES - Risks from Climate Change

The QSPP 2017 states that: *'Planning has a critical role to play in adapting to and minimising the impacts of climate change, while enhancing the sustainability and liveability of our state'.*

- **The Whitsunday Regional Council Climate Innovation (WCCIH) lists the following as threats to our region due to climate change:**
  - Species and ecosystem shifts, affecting biodiversity and ecosystem function
  - Heat impacts on flora, fauna and biodiversity loss
  - Human health & wellbeing impacts including the effects of heatwaves
  - Costs associated with adaptation of infrastructure and buildings
  - Negative impacts upon important industries such as tourism and agriculture
  - Negative impacts on the liveability of the region
  - Sea level rise of 80cm above present levels, by 2100.

- **WCC urges WRC to be proactive and forward-looking in considering and mitigating the risks of climate change impacts with respect to MLES for all of the following:**

  - development approvals
  - locations of new capital infrastructure and assets
  - vegetation management & retention requirement
  - locations of open space and water sensitive urban design for storm water management
  - management of soil erosion on development sites and Council managed areas in light of increasingly intense and unpredictable high rainfall events, such as the 'river in the sky' experienced in Townsville in 2019. This is necessary to reduce impacts on inshore water quality from sediment.

- WRC residents already face high rates and increasingly high insurance costs to live in our region. WRC should be doing all it can to mitigate the future costs to the community associated with rectification works, and potential legal liability for approval of developments if they are not designed to minimize known risk of natural disasters.

- **To minimise these very real risks, the LPS should:**

  - determine adequate buffer zones between new developments and associated coastal, riparian and/or wetland areas and implement measures to ensure their retention when properties change hands; at present they can be, and often are, removed by subsequent owners.

- restrict building/ land clearing within floodplain/storm surge/ landslip zones to reduce WRC (ratepayers) liability for development in these zones.
- require designed-in mitigation measures for urban heat retention, to minimise the effects of higher temperatures and heatwaves on residents
- consider the risks of increased storm and cyclone intensity on proposed developments and ensure that measures are implemented to ensure resilience in the face of such events, including not approving risky developments that will be a future liability to ratepayers

5. MLES - TREE CANOPY: Mitigation of Urban heat retention

The current LPS does not address the increasing effects of high temperatures and heatwaves due to climate change, even though they have been identified by organisations such as the Australian Medical Association as posing significant threats to human health. A plan for an urban tree canopy is needed as a MLES.

https://www.ama.com.au/media/climate-change-health-emergency

As it gets hotter, the ratio of hard-surfaced areas to green space, becomes an important factor in maintaining a safe and comfortable climate for residents and visitors. The safety and comfort of people undertaking work & outdoor recreational activities outdoors is already being impacted on by heatwaves as they become more frequent and longer.

If the LPS continues to allow losses of the urban tree canopy to large expanses of hard paving & dark surfaces such as bitumen carparks, small lot size/ large building envelope ratios, dark roofs and the unregulated removal of vegetation/ surface hardening in urban & commercial developments, the urban heat-sink impacts will increasingly affect the safety and quality of life for all life forms; human, plant and animal.

The urban heat sink's radiating heat from hard surfaces during the night reduces the capacity for night time temperature reduction. This can already be felt in the Airlie Beach main street, where the temperature in the early morning in summer is already around 2 degrees higher than it is in Cannonvale.

See the research being undertaken at James Cook University: https://www.jcu.edu.au/TUDLab/research-projects/sensing-cities-smart-thermal-comfort-and-climate-adaption and the CRC for Water Sensitive Cities: https://watersensitivecities.org.au/urban-heat/

Combine the high temperatures with high humidity, which reduce the human body's ability to cool with sweat, and it becomes increasingly dangerous to work or recreate outside in summer. Humans have the luxury of air-conditioning, (until cyclones or power grid failures, then many if not most local homes become unliveable in hot conditions), but the impacts of ongoing high temperatures on the plant and animal world are only just being discovered.

6. MLES - URBAN PARKS: Human Health & Wellbeing

- The retention of vegetated natural - MLES designated - areas adjacent to residential developments has been shown to be important for people's mental and physical health. (https://www.aihw.gov.au/reports/australias-health/natural-environment-and-health). This has become increasingly important in recent years as rates of depression and anxiety increase in the community. Our spectacular natural surroundings have attracted many new people to come and live and work in our region. Climate change and Covid-19 are affecting Australians and changing the way they live. Natural areas and open space within comfortable walking distance are increasingly sought after. Not everyone has a car to travel, so well managed urban green spaces become ever more important, especially for the most vulnerable: the young and the elderly.

- Without forward-looking plans to retain mature trees and native vegetation as MLES such as viable riparian corridors, keeping the green hills that form a backdrop to the area intact and undeveloped, and retain sufficient natural areas within or adjacent to new developments, for recreation, habitat, cooling and water infiltration, we risk losing these values forever.

- Council should be proactively planning to maintain as MLES walking-distance access to natural, vegetated areas as it plans new subdivisions. AND maintaining and enhancing current urban parklands and open spaces. This can be achieved by encouraging the strategic retention of as many established trees as possible within developments, at the design stage.

- In the past Council policy led to many small blocks parks being set aside at the whim of developers with little or no thought to their value either for wildlife or recreation. By the completion of the developments, these blocks often had all the vegetation significantly degraded or largely removed, necessitating public spending later to restore the vegetation, or where this has not occurred, some have become dumping grounds for garden waste, resulting in the establishment and spread of invasive weeds.

- This failure of council parkland management appears to be now used as a justification for Council to consider sale of these small parks on the basis of their "being of no particular benefit to the community", leaving people in these highly developed subdivisions with even less access to natural areas and open space than before. On the contrary, it is clearly evident that these parks are being used in one way or another by the local community in their current forms.

Allowing urban parks to degrade and them claim them unsuitable is a deliberate and unacceptable management strategy.

- Include urban parklands in MLES: A better management strategy would surely be for Council to strategically define areas within lands that are earmarked for residential housing that are selected based upon sound criteria such as their habitat value, connectivity, recreational potential and visual amenity. These could then be prioritised as natural reserves at the planning stage and protected from damage from the beginning of the project. Retention of trees should be prioritised as established trees provide more benefit in terms of ecology, habitat and cooling than new plantings done by developers which tend to suffer from poor establishment practices and low survival rates. Even with the best practices it takes many years for them to mature to have an equivalent benefit.

7. MLES – URBAN WOODLANDS & MATURE TREES

The current development practise of broad scale clearing followed by revegetation should be a last resort, not standard practice. The ecology of urban woodlands and established habitat trees are a MLES enhancing not only the character of an area but providing food, nesting, shade and a cooling in urban environments.

- At present, no protection is afforded to mature trees from removal. Loss of large trees has a significant opportunity cost as it takes many years for a new planting to achieve even a little of the habitat and cooling value of an established tree.

- Prior to amalgamation, the then Whitsunday Shire Council initiated a significant tree register which existed until approximately 2014, but we have been unable to locate a copy. The task of documenting 'significant trees' throughout the LGA is enormous, and beyond the abilities of our group. Council also is unlikely to commit the level of resources that this task would require. However, it needs to be done.

- We still firmly believe that it is in the public interest to prevent unnecessary removal of mature trees, as the benefits that they provide in shading and cooling urban areas and providing wildlife habitat, cannot be quickly replaced by new plantings.

- It is also important that mature specimens or trees that have social, environmental, historic, aesthetic or indigenous significance be protected, so we suggest that in addition to a register of trees that are significant to the community, some protection from thoughtless removal be afforded to trees which are over a certain basal diameter of 250cm.

- For example, adoption of development practices such as those outlined by the Department of State Development in the document below: https://www.statedevelopment.qld.gov.au/__data/assets/pdf_file/0023/33269/practice-note-06-tree-retention.pdf

- Another approach is to supplement the significant tree register with overlays identifying the presence of established native habitat and individual mature trees for protection. The mapping would enable some trees to be retained at the planning stage through exploration of different development design alternatives.

- Mackay Regional Council has a significant tree register as well as tree management guidelines which recognizes the value of urban trees:

'Trees provide many benefits including reducing temperatures in the built environment, adding value to properties, increasing aesthetic appeal, softening of hard lines of buildings, providing privacy and a sense security when used as visual screens, as sound barriers and screening unsightly views. Trees provide wildlife habitat, reduce stormwater runoff, reduce erosion, reduce dust, release oxygen, absorb carbon dioxide and air pollutants. Trees can increase the value of properties in areas with many trees as a street scape.'

'When a resident requests a tree to be removed the request is assessed on a set of standard criteria. Trees will not be removed due to dropping leaves or minor twigs, overhanging properties, overhanging pools where a pool cover can be used. Trees will not be removed to improve a resident's view or because a resident continually requests the removal of a tree that is deemed structurally sound.'

https://www.mackay.qld.gov.au/residents/environment/natural_environment/trees_and_vegetation/tree_management_guidelines

Rockhampton Regional Council protects trees in public areas from removal for reasons other than safety:

Their policy recognizes the importance of the ecosystem services provided by established trees and generally does not approve removal for any of the following reasons:

- *The tree obscures or potentially obscures views;*
- *The tree species planted is disliked;*
- *The tree variety causes nuisance by way of leaf, fruit, bark shedding or other*
- *natural processes;*
- *The tree shades private gardens, solar panels, solar hot water installations or*
- *similar; or*
- *The tree is determined to have biodiversity values, such as a hollow, breeding place or 'habitat' tree*
- https://www.rockhamptonregion.qld.gov.au/files/assets/public/legal-amp-governance/policies-amp-procedures/tree-management-policy-v2.pdf

- **Brisbane City Council uses the following approach:**

    - All native vegetation in areas mapped as Significant Native Vegetation is protected under the NALL. Significant native vegetation includes native vegetation, from small ground covers and native grasses to large trees.

- This protection category includes:
    - native vegetation that has ecological value and provides important habitat or is a food source for wildlife.
    - native plant species that are unique to the region and state, such as hoop pines that were once part of rainforest communities that covered parts of Brisbane.
    - native vegetation contributing to the preservation of natural landforms, bushlands, ridgelines and steep slopes.
    - trees, shrubs, groundcovers and vines including dead trees or hollow logs, that collectively provide important habitat for wildlife.
    - native vegetation communities such as *Melaleuca* wetlands and rainforests that provide unique and valuable habitat for fauna species.
- Importantly, whatever approach is taken, it has to be backed up with suitable penalties for breaches. In the case of poisoning/ felling trees on public land to 'improve' views, the most effective method used by other Councils seems to be placing a billboard where the tree was, with signage to the effect that it is there because someone killed the tree. A replacement tree is also planted, and the billboard is removed when the replacement tree matures. If they damage it again, the billboard remains.

➢ Whatever approach is adopted, it should be done by considering what other LGAs have done and what methods will be applicable here. Public consultation should be carried out with the community before any policy is finalised.

8. MLES - Ridgelines and high slopes of hillsides

➢ These areas are an important component of the scenic beauty of the area: they should be left intact and uncleared. There are enough "McMansions" on our ridgelines already. They also pose a much higher risk of landslip and soil erosion, if developed.

➢ They are also difficult places to fight fires. We have seen recently how fast fires can travel up these slopes once the rainforest is cleared and flammable weedy grasses take over. It took 3 days of a helicopter water bombing with sea water to put out a fire in Airlie Beach which was pushed up the slope by northerly winds a couple of years ago. If they had failed it would have burnt some properties up the hill and could also have burnt into Conway National Park.

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Sustainable Development

Measures that Council should urgently implement as MLES to protect/ preserve and enhance character and liveability:

Some ways that the LPS can promote the sustainable development of the LGA:

- reduced density of urban development, larger lot sizes & smaller building envelopes
- retention of strategically positioned green spaces,
- development controls which require heat reflective surfaces, rather than absorptive ones
- wider verges with street trees; locally sourced native species are more suited to the climate and better placed to survive with minimal support in a changing climate
- vegetation retention requirements for existing natural vegetation outside the building footprint
- preservation & protection of all riparian corridors
- open green spaces connected to residential areas (walking distance)
- building guidelines requiring designs that are well insulated and ventilated, and suitable for the tropics, with room for a cooling garden, will result in places that are healthier and cheaper to live in into the future
- Direct future development into the landscapes that have a greater capacity to accommodate increased urban development- such as Bowen.

If we reflect on the current experiences resulting from inappropriate development controls that has been allowed in many Australian cities and towns, including in the Whitsunday region, the problem of urban heat sink is significant and is increasingly affecting human health. We can mitigate this if the WRC LPS regulates development to create liveable communities suited to living in a tropical zone in a warming climate. Much of the research has been done, it now needs to be implemented.

Improving water with modern stormwater runoff management (WSUD)

WCCIH predicts that as a result of climate change we can expect an increase in heavy rainfall events which will become more intense and our dry seasons are predicted to become drier. This results in greater impacts upon water quality from extreme rainfall events, as we have seen in the recent floods in Lismore and Brisbane. It also reinforces the need for water sensitive urban design to be required in all future development approvals in order to maintain water supply by reducing the need to use expensive potable water on gardens, to improve water quality by reducing and filtering runoff and thereby minimise the impacts upon the inshore marine environment.

See James Cook University research: https://www.jcu.edu.au/TUDLab/research-projects/urban-water
and the CRC for Water Sensitive Cities
https://watersensitivecities.org.au/

Rain events are becoming increasingly unpredictable and intense. As more development occurs and more land area is hard surfaced, the volume and force of runoff to our creeks and waterways increases. The record-breaking rain events that we are seeing under climate change will exacerbate this problem.

In the past this has been addressed solely by engineering approaches, which prioritise channelling water as quickly as possible to the sea. This has left us with a legacy of creeks that have been turned into ugly concrete drains that deliver muddy, polluted water laden with nutrients and plastic debris directly into the inshore marine environment. The few natural creeks that have been allowed to persist are degraded drains that are indiscriminately 'scraped' free of all weeds and native plants, silt and debris every year by a contractor with an excavator (not a specialist) to enable large volumes of stormwater to flow through them quickly. This process usually results in damage to riparian vegetation and erosion of the banks.

For example: On one occasion the contractor left all of the uprooted vegetation in the creek, in the dry season, which then turned anoxic and presumably killed all organisms in the creek. The banks of the creeks are also denuded of protective undergrowth by repeated chemical spraying and are left as largely bare soil, which contributes to the sediment/ toxin load during rain events.

It should no longer be considered acceptable to continue to use riparian and creek-line habitats as stormwater drains. Channelling urban runoff straight to the sea is harmful to our coastal water quality, affecting habitats such as mangroves, seagrasses and corals, and directly undermining Airlie Beach as a tourist attraction.

Council has signed on to GBRMPA's Reef Guardian Council program, which obliges Councils to develop a program of activities to minimise negative local impacts on the Great Barrier Reef World Heritage Area (GBRWHA). This commitment should be honoured by reviewing and improving all Council activities in light of impacts on climate and local water quality and implementing measures to reduce/ mitigate them.

Water sensitive urban design (WSUD) is being used successfully in tropical cities to creatively capture and use stormwater by increasing infiltration and reducing runoff of contaminated stormwater, using landscaping features such as swales and artificial wetlands. This is needed to reduce the soil, chemical and nutrient runoff from urban stormwater which is delivered into coastal habitats such as seagrass, mangroves and coral reefs during rain events.

Good designs using suitable vegetation also help cool the local microclimate and also add to visual amenity and MLES. See:
https://www.townsville.qld.gov.au/__data/assets/pdf_file/0006/12210/WSUD-as-Best-Management-Practices-V3.pdf
and
https://watersensitivecities.org.au/

These areas also provide visual amenity, wildlife habitat and contribute to reducing the urban heat island effect.

According to the Mackay-Whitsunday-Isaac Healthy Rivers to Reef Partnership, of which Council is a member, the Whitsunday inshore marine zone has remained in an overall 'poor' condition for the fifth consecutive year (2021 report card).
https://healthyriverstoreef.org.au/report-card-results/

In light of the importance of water quality both to the environment, public amenity and the tourism industry, we consider it not unreasonable to expect that future development, both residential and commercial should be required to meet high water quality standards for storm water issuing from the development before, during and after construction. Water Sensitive Urban Design (WSUD) will improve the water quality impacts of all developments on the local GBR Marine Park and should be a high priority in the planning process.
https://watersensitivecities.org.au/crcwsc-legacy/

Use of plastic erosion barriers should be discouraged in favour of sisal/ hemp products, as in practice, the barriers are never removed and the plastic eventually breaks up and washes away, adding to the marine plastic pollution problem.

There has been a great deal of public investment in encouraging canegrowers and other and agricultural landholders to modify their practices and invest in measures to ensure that stormwater is retained and treated before leaving their properties and issuing into Great have to follow the same requirements. These WSUD requirements should be incorporated into WRC planning and approvals.

Existing relevant Reports, Plans & Community Consultations

It must be said that the local community has been 'consulted' with widely, thoroughly and over a long period of time. In each of the resulting documents there have been a consistent set of values (MLES) expressed, and preservation of the natural environment tops the list.

WCC questions how many, if any, of the community's extensive input and recommendations in these consultation processes have been adopted?

This is a quote from town planning consultants (Stender &Co.) in 1989 which shows that people valued the aesthetics of the undeveloped hillsides even back then, even if the vision was not realised:

> *'The guidelines are intended to assist in the retention of the Coast's natural attributes, through the conservation of the major visual and aesthetic features of the hillsides. It is recognised by Council that poorly designed and constructed developments in hillside areas can frequently result in substantial public costs and can be a threat to public safety. Landslip, increased runoff and sedimentation can result in increased public expenditures, either for facility repairs or protective measures to avoid further damage. In view of these considerations, it is Council's intention to encourage development to locate in areas with slopes less than 20%... lands with slopes of 30% or greater are considered unsuitable for development and are to be retained in their natural state.*

Rather prophetic considering how much public money is spent trying to mitigate the effects of unsuitable development on water quality alone, and the amplifying effect of climate change is only just getting started.

Recommendations from the Whitsunday Regional Council's Climate Change Innovation Hub (WCCIH) should also be acknowledged and incorporated, in order to minimise or avoid possible legal liability for damages when climate change impacts lead to loss of property or property value, or worse. Of course, this would also assist in avoiding the negative impacts on local communities, industries and the natural environment and in building more resilient local communities.

WCC recommends that the listed documents be reviewed, updated and developed into planning scheme policies & overlays that will inform the local planning and development approval process. These documents should be reviewed and updated as a priority in the context of:

- climate change impact predictions from State and Federal authorities and with consideration of those impact predictions on current Federal, State and Local Matters of Environmental Significance and on the community as a whole

- be updated to include water sensitive urban design instead of engineering creeks into drains.

All the Whitsunday Regional Council documents listed have relevance to MLES.

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Available Documents relevant to MLES (current & historic)

- Whitsunday Coast Tourism Development Concept Plan and Draft Planning Policies, Stenders & Partners, Architects, Urban Designers & Town Planners, January 1989

- Queensland State Planning Policy 2017, Department of Infrastructure, Local Government and Planning

- Whitsunday Regional Community Plan 2011-2021

- Whitsunday Regional Council Disaster Management Plan

- Whitsunday Regional Council Corporate Plan 2021-26

- Whitsunday Regional Council Masterplans for Airlie Beach 2021; Bowen 2021; Collinsville 2021 and Proserpine Sustainability and future growth masterplan 2017.

- Whitsunday Regional Council Economic Development Strategy 2017

- **Draft Whitsunday Urban Bushland Management Plan September 2005:**
  The final draft of this document was produced in 2005 for the former Whitsunday Shire Council (pre-amalgamation) and was presented to Council and endorsed on the 6 March 2006. This document is of significant value as it details all of the undeveloped Council managed reserves from Mandalay to Riordonvale and contains valuable information on the natural attributes, values, current and potential community use of each reserve.

  WCC recommends as a priority that the Draft Whitsunday Urban Bushland Management Plan September 2005 document be resurrected and updated to include all townships in the LGA. The revised & updated version should be adopted by Council as a management tool for Council MLES urban bushland reserves throughout the LGA, as a matter of urgency, as many of the values it describes have no protection at present.

  The process of developing an LGA wide WRC Urban Bushland Management Plan should include other assessment values such as climate change mitigation, water quality, changing community needs and the value existing bushland reserves will have in flora and fauna conservation over the long term future in light of planned urban/industrial/agricultural/tourism development expansion.

WRC GBRMPA Reef Guardian Council Action Plan, which outlines the measures proposed to be undertaken by Council to meet its obligations under this agreement https://www.whitsundayrc.qld.gov.au/downloads/file/234/reef-guardian-council-action-plan-2020-2021

These measures were originally to be funded by the Biodiversity Levy, which did not survive Council amalgamations. Without this levy to supply funding, it is unlikely that Council will ever have the resources to implement any environmental management beyond the bare minimum that we have seen to date since the amalgamation.

- Vision Airlie 1998 was a large and extensive public consultation exercise delivered by Kinhill Pty Ltd, examining community expectation and vision for the future of Airlie Beach, for the then Whitsunday Shire Council. It was most notable in the findings about local MLES and community aspirations to retain them, being ignored.

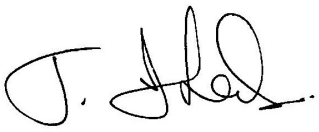
  WCC has been unable to obtain a copy of the report, however enough of our members and other people were involved in the whole process to remember that the community aspirations for retention of the outstanding natural beauty of the area: of green hills & blue seas visually dominating over human developments, with no high rise on the foreshore and development kept well below the ridgelines.

- Whitsunday Coast Tourism Development Plan- January 1989

- Whitsunday Shire Council had a Significant Tree Register, a document which is rumoured to exist but may or may not have ever been populated. We consider that an instrument of some kind is urgently required to ensure that thought is given to retaining large/ significant trees in developed areas where possible. If we fail to do this now, we will lose the cooling/ shade benefit of the established tree canopy which will be essential in mitigating heatwaves from climate change.

Conclusion:

MLES are urgently needed to be included in the Whitsunday Planning Scheme, as we are undergoing another building boom. With every boom, we lose more of our precious (MLES) natural areas, native vegetation and wildlife in relentless death of a thousand cuts. We also lose the ecosystem services that they provide, such as clean air, water, cooling and the mental health benefits of being in a biodiverse, healthy environment. We lose the (MLES) unique visual character of the Whitsundays as diverse (MLES) natural habitats are replaced with generic 'tropical' gardens which all contain the same small set of species of introduced plants, or worse still, concrete and bitumen. We also lose the opportunity to learn from past mistakes so that we can plan and design these new developments to make them a better place to live now and in the future. Once a poor planning decision is made, you can't wind back the clock, you have to live with the consequences.



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