

North Queensland Conservation Council Inc.

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Deputy Premier

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

C/O Department of State Development, Infrastructure and Planning (Planning Policy team)

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NQCC Response to the Natural Hazards Planning Discussion Paper

North Queensland Conservation Council (NQCC) welcomes the opportunity to provide feedback on the Response to Natural Hazards Planning Discussion Paper. NQCC is the voice for the environment in North Queensland – a region spanning from the Coral Sea to the Northern Territory border.

For more than 50 years, NQCC has worked with community, governments and regional stakeholders to protect the species, landscapes and ecosystems of North Queensland, including many that are found nowhere else on Earth.

While worsening natural hazards put these natural values at risk, there is evidence to suggest that investment in healthy ecosystems will be increasingly important to protect communities and infrastructure from these hazards. Adequately valuing our state's "green infrastructure" will be a win-win for biodiversity and human health and safety in a changing climate.

We acknowledge the many Traditional Owner groups of this region and pay our respects to their Elders, past and present. We recognise and respect their knowledge, their rights to self-determination and their ongoing connection to Country.

Responses to Discussion Paper Questions

Do you support the proposed shift from an “avoid then mitigate” approach to an approach that allows development where risks can be appropriately managed or mitigated? Why or why not?

NQCC does not support an unqualified shift away from avoidance. Avoidance should remain the first preference, particularly where risks to life and safety are severe, future risk is uncertain, or consequences could be irreversible.

Mitigation can be appropriate where risk can genuinely be reduced to an acceptable level, but the policy should recognise that not all risks can be adequately mitigated, and that engineering solutions can fail or become less effective as climate hazards intensify.

Assessment should consider risks to surrounding properties and communities, cumulative impacts, residual risk and long-term maintenance – not just whether the development itself can be protected.

What information, guidance or factors should be considered when determining whether natural hazard risk is acceptable, tolerable or intolerable?

Use the best available hazard mapping, historical events, scientific evidence and forward-looking climate projections, including the likely changes in hazard frequency, intensity and extent over the development's lifetime.

Consider consequences for human life, vulnerable people, emergency services, evacuation routes, critical infrastructure, neighbouring properties and the natural environment.

Assess cumulative effects, the reliability and lifespan of mitigation measures, residual risk, who bears the cost if measures fail, and whether the development could compromise natural systems that reduce hazard impacts.

Definitions of “acceptable”, “tolerable” and “intolerable” should be transparent and applied consistently, rather than left to broad discretion without clear criteria.

What role should the Queensland Government and local governments play in assessing and managing natural hazard risk through planning?

The Queensland Government should establish clear minimum standards, consistent risk thresholds, authoritative mapping and climate-change assumptions, and provide technical and financial assistance to councils with limited planning resources.

Local governments should apply those standards to local circumstances, including local knowledge, community vulnerability, local drainage and catchment dynamics, and the practical implications of evacuation and emergency response.

Responsibility should be shared, but state-wide minimum protections should not be weakened simply because local governments have different resources or development pressures.

Where, if at all, should Queensland establish state-wide limits on new development due to natural hazard risk?

Establish clear state-wide limits for areas where risks to life and safety cannot be reduced to an acceptable level, particularly high-risk coastal erosion areas and locations where future hazard exposure would be severe or evacuation impracticable.

Consider limits on new urban development in areas exposed to severe flood and storm-tide risks, taking account of future climate conditions rather than relying only on historical hazard extents.

Protect natural hazard-buffering landscapes – such as wetlands, floodplains, riparian vegetation and coastal ecosystems – where development would compromise their protective function. This should complement, not replace, direct limits on unsafe development.

Where, if at all, should Queensland draw a clear line between acceptable and unacceptable natural hazard risk for new development?

A clear line is warranted where there is an unacceptable risk to life, where safe evacuation or emergency response cannot reasonably be assured, or where the consequences of failure would be catastrophic.

The line should be based on consistent, evidence-based criteria and future hazard scenarios, not solely on whether a developer can propose a mitigation measure.

In what circumstances should development be supported in areas exposed to known natural hazard risk, and what measures should be considered to manage that risk?

Support may be appropriate in only very rare cases where development is in an already-established urban area, serves a clear community need, and risks can be demonstrably reduced without transferring risk to others or undermining natural protective systems.

Prioritise alternatives such as locating development elsewhere, avoiding the highest-risk parts of a site, limiting the intensity or type of use, and retaining or restoring natural buffers.

Where development proceeds, measures should include appropriate siting and design, safe evacuation or refuge, resilient infrastructure, drainage and flood storage, ongoing maintenance and monitoring, and transparent communication of residual risk.

Avoid treating major engineering works or property-level protections as a substitute for sound land-use decisions, especially where future risk is expected to increase.

What improvements can be made to existing guidance?

Clarify how “acceptable”, “tolerable” and “intolerable” risk should be determined, including the evidence and climate scenarios that must be considered.

Provide practical guidance on cumulative and off-site impacts, residual risk, the limits of mitigation, and the role of natural systems in reducing hazard exposure.

Interactions between multiple hazards should also be given more consideration. For example, parts of North Queensland are prone to flooding, cyclones, storm tides, coastal erosion and extreme heat, and these hazards can occur simultaneously.

Is there any other guidance required for local government, businesses, communities or landowners?

Provide accessible, consistent information explaining what hazard maps mean, how future climate conditions affect risk, and what planning decisions may mean for people and places.

Develop and make available statewide heat hazard mapping, to help inform planning decisions.

Help councils assess nature-based solutions alongside engineered approaches, including how to protect and restore wetlands, floodplains, riparian corridors and coastal vegetation.

Provide technical and funding assistance to councils to update assessments and planning controls, especially smaller regional and remote councils.

When should state advice be guidance or mandatory for local government?

State advice should be mandatory where it establishes minimum protections for life and safety, addresses high or intolerable risks, or protects natural systems with an important hazard-mitigation function.

Guidance can allow flexibility in how councils implement those requirements to reflect local circumstances, provided the minimum outcomes are achieved.

Where state-wide standards are advisory only, there is a risk that protections will vary according to local resources or development pressures. The policy should make clear which requirements are mandatory and how departures from guidance should be justified.

Where is greater state direction or guidance needed, and where should local government retain flexibility for natural hazard mapping?

The state should set consistent minimum methods, data standards and climate assumptions for mapping hazards, including how future conditions and uncertainty are addressed.

Local governments should be able to refine state mapping using better local evidence but should only use local discretion to reduce protection with sound justification.

Mapping should recognise the links between catchments, floodplains, coastal processes and downstream communities, rather than treating hazards as isolated site-level issues.

How would you like to be informed and involved when changes are made to natural hazard mapping affecting your property and community?

Clear public notification is needed when mapping changes could materially affect development rights, property decisions or community safety, with accessible explanations of what has changed and why.

Meaningful and accessible opportunities (including adequate timeframes) should be provided for affected communities, Traditional Owners, local experts and councils to identify missing information and contribute local knowledge before significant changes are finalised.

The underlying data, methods, assumptions and uncertainty should be made accessible, with a clear process for raising errors or submitting new evidence.

What could be done to make natural hazard mapping simpler, faster and more consistent across Queensland?

Establish a coordinated, publicly accessible state-wide mapping platform with consistent terminology, data standards and clear information about the date, source and limitations of each map.

Improve coordination and data-sharing between state agencies, councils and relevant technical experts, and provide ongoing resources for regular updates.



North Queensland Conservation Council

... the voice for the environment in North Queensland

Make sure streamlining does not come at the expense of accuracy: maps should be updated as new evidence becomes available, with transparent treatment of uncertainty and future climate conditions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Crystal', is written over a light blue rectangular background.

Crystal
Coordinator
North Queensland Conservation Council

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