



Australian Institute of  
Landscape Architects

**Healthy Land and Water**  
**PO Box 13204, George Street Brisbane QLD 4003**  
**Via Email: [info@hlw.org.au](mailto:info@hlw.org.au)**

17 January 2022

***Re: The South East Queensland Natural Resource Management Plan 2009-2031 (2021/2022 update)***

Thank you for the extension of time to allow the Queensland Chapter of the Australian Institute of Landscape Architects (AILA) to provide feedback on the draft South East Queensland Natural Resource Management Plan (2021) (SEQNRMP), we appreciate the opportunity to comment. As landscape architects working in Queensland, we have a strong interest in ensuring that the natural assets of SEQ are appropriately managed to protect their important values including supporting a sustainable, resilient and healthy future for our communities.

The goals and ambitions of AILA closely align with Healthy Land and Water's mission to build the prosperity, liveability and sustainability of our 'future region.' In particular, we applaud your ongoing efforts to address the critical issues currently challenging our region:

- climate change and the implications of extreme weather events (fire, flood, drought and coastal inundations);
- the pressure on natural assets arising due to population growth;
- the impacts of the ongoing COVID-19 pandemic; and
- the opportunities arising due to the spotlight that will be placed on SEQ in 2032 as a result of the region's successful Olympic Bid.

AILA is the peak national body for Landscape Architecture, leading a dynamic and respected profession: creating great places to support healthy communities and a sustainable planet. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. AILA's national position statements on Green Infrastructure, Climate Positive Design, Child Friendly Cities, Healthy Communities and Active Travel all examine how landscape architecture plays an important role in developing these strategies – you can view them [here](#).

Please find attached comments from AILA Queensland regarding the SEQNRMP.

AILA welcomes the opportunity to remain involved in the development of this important plan for the region and would be happy to discuss any of the issues raised above with you as the plan is implemented. Should you have any queries or wish to discuss, please contact Melanie West, AILA Queensland Chapter Manager on 0417 666 622 or [melanie.west@aila.org.au](mailto:melanie.west@aila.org.au)

Yours sincerely,

Tessa Leggo  
Queensland President  
Australian Institute of Landscape Architects



## Comments on overall strategy

The overall strategy provides an excellent framework for preserving and managing the health of our natural assets. The key component in supporting landscape architects to ensure these principles are met, is how this information translates into guiding policy and legislation. We understand Healthy Land and Water is looking to implement elements through the Australian Government Regional Land Partnerships Program. We also understand some highly significant elements will be introduced into the EPBC Act.

However, we are interested to know the strategy to communicate the measurable targets and how does each relevant authority understand their required measurable outcomes so that it can be translated into the guiding Planning Schemes and policies? We understand that the full implementation strategy may be yet to come, as only the next two years are detailed but wanted to flag the high importance this plays in gaining traction in achieving these outcomes.

The successful outcome of each of the asset themes depends not only on their individual criteria, but also on the relationships they play with the surrounding land uses. As such, identifying and looking to resolve regional planning issues would be valuable to this plan. For example, dealing with issues such as agricultural buffers to separate urban development, distancing wind drift of pesticides etc. There needs to be integration across the agencies for planning and these should be based where possible on environmental factors, not necessarily cadastral/zoning systems and boundaries. For example, supporting important biodiversity corridors/ waterways, for regenerative agriculture integrated into the planning. This should come from a basis of planning for a healthy environmental system and ecosystem services that underpin healthy agriculture/ land use, not just current ownership/ zonings. Government should be looking at innovative solutions such as possibilities of land swaps and other mechanisms when reviewing these planning policies to help support these outcomes.

Another element that was challenging at times (when reading the draft strategy) was that the measurables of many of the targets are not clear. Typically, the comparison dates are not the same. Eg "By 2031, the 2008 extent and condition of SEQ wetlands will be maintained or increased". When you go to the target specific section on the plan it elaborates "There had been a loss of over 1,397 hectares of natural wetlands since 2001". If the comparison data was from 2008, that would then provide a clear and measurable goal. In some instances this also caused confusion about the general nature of the target eg "By 2031, more than 90% (>1,266,667 hectares) of South East Queensland agricultural land that was available in 2004 will be available for sustainable agriculture". While it is great that an area is provided, there is still confusion as to whether this is more or less than what is currently available.

In relation to the relevant asset themes currently defined, we believe the following issues are important to consider in the development of the final plan:

### Nature Conservation

The ongoing loss and fragmentation of vegetation across the state as a whole, including within SEQ, is a key issue and we strongly support the target to maintain or increase the regional vegetation cover across the region. Whilst acknowledging the difficulties faced, we advocate for



clearly defined stretch targets, including through the actions identified. In particular, we support the need to increase the extent of protected areas in SEQ through identification of key locations that are most vulnerable to the forces for change identified or where key ecological links are currently absent. The protection of these areas should be integrated, as the opportunity arises, into regional and local planning schemes and policy as a priority and we believe Healthy Land and Water should work with the community to lobby against any intrusion on these areas.

We note and support in principle, the proposed action to minimise the impacts of recreational activities on areas of nature conservation significance. However, in recognition of the growing population and increasing need for communities to take part in healthy outdoor recreation activities, we recommend that Healthy Land and Water seek to work with stakeholders at all levels to accommodate increased recreation opportunities in areas of lower sensitivity and to work together to manage recreation pressures in existing areas.

We note that Healthy Land and Water looks to support private landholders to manage and preserve bushland, manage regrowth, revegetate and manage for pests, weeds and fire. We are aware that the Queensland Government has established the Land Restoration Fund with incentives for carbon farming through revegetation on private land, which closely dovetails with Healthy Land and Water's objectives. In addition to creating the incentive of a revenue stream for the landholder, there are also valuable co-benefits such as better drought response, healthier waterways, increased habitat for threatened species and more resilient landscapes that deliver additional environmental, socio-economic and First Nations co-benefits. All targets of this plan. This could be an opportunity for Healthy Land and Water to act as the conduit to existing government incentives (such as this) and be instrumental in the collaboration with authorities for the creation of other incentives.

## **Water**

We are encouraged that there is a slight improvement in water quality of the region and support ambitious targets to continue to enhance this. We support the key actions proposed including the ongoing commitment to Water Sensitive Urban Design (WSUD), provided this is managed in an appropriate and balanced manner within the urban area that also maintains and increases the provision of street trees. Total permeable surface areas may be another measurable worth considering.

## **Coastal and marine**

We support the aim to enhance the condition of the coastline, wetlands and associated ecosystems. We support improvements to coastal planning processes to avoid development that will fragment and damage coastal ecosystems.

## **Air and atmosphere**

We are concerned about the trend in the increase of particulates in the air, which will continue to rise as the population grows as projected. We strongly support the actions nominated in the plan. In particular, we encourage the proposed 'restore' actions. We encourage Healthy Land and Water to work with stakeholders across the region to identify key areas for habitat restoration and creation (including opportunities for acquisition, through offsets and within developments) to provide a buffer for priority habitats and enhance connectivity across the region. We recommend development of a detailed action plan that considers how newly created habitat areas can contribute to the recreational needs of growing communities to deflect growing pressure from



sensitive environments elsewhere in the region. As noted in the plan, the importance of public transport, cycling and walking will be fundamental – this is an issue explored and promoted by AILA in our [Active Travel national position statement](#).

### **Regional landscapes**

We support the aim to continue to maintain regional landscape areas including the need to supply increased land to support the recreation requirements of the growing population. While we support the protection of identified priority scenic amenity areas from inappropriate development, we are concerned that this action is not sufficiently ambitious and fails to promote the need for scenic values of the region more widely to be protected and enhanced. Our key concern is that as the population grows and development expands scenic amenity values across the region will become incrementally eroded by inappropriate development. Furthermore, the identified regional landscape values in shaping SEQ exclude the urban areas. It is therefore important that the SEQNRM does not ignore these areas and specifically includes management actions, such as the targeted provision of green and blue infrastructure within the urban footprint, that will enhance the scenic amenity value of these areas and deliver wider ecosystem services benefits. We also recommend specific targets around the maintenance of inter and intra-urban breaks to prevent urban coalescence and the corresponding impacts on habitat connectivity.

### **Land**

We support the commitment to sustainable agriculture and the associated actions, including the promotion of Best Management Practice programs across the region.

### **Community**

We support the ongoing commitment to work with stakeholders across the region and the actions proposed to empower community groups.

### **Traditional Owners**

We support the aim to implement the South East Aboriginal Traditional Cultural Resource Management Plan and the development of Reconciliation Action Plans.

### **Conclusion**

In conclusion, as outlined in the cover letter, AILA applauds Healthy Land and Water's ongoing efforts to address the critical issues currently challenging our region:

- climate change and the implications of extreme weather events (fire, flood, drought and coastal inundations);
- the pressure on natural assets arising due to population growth;
- the impacts of the ongoing COVID-19 pandemic; and
- the opportunities arising due to the spotlight that will be placed on SEQ in 2032 as a result of the region's successful Olympic Bid.