DELIVERING FOR QUEENSLAND | Queensland Government

Department of
State Development,
Infrastructure and Planning

SARA reference: 2510-48963 SRA
Council reference: CA 2025_5841/1 (1328479)
Applicant reference: AU017394

17 December 2025

Douglas Shire Council
C/- RPS AAP Consulting Pty Ltd
PO Box 1949
CAIRNS QLD 4870
Patrick.Clifton@rpsconsulting.com

Attention: Patrick Clifton

Dear Patrick

SARA information request—Daintree River Ferry Upgrades at Cape Tribulation Road, Lower Daintree

(Notice issued under section 12 of the Development Assessment Rules)

SARA has undertaken a preliminary review of the material provided in support of the above referenced application which was deemed properly referred on 26 November 2025.

From this review, SARA has identified a range of matters relating to State code 8: Coastal development and tidal works (State code 8) and State code 22: Environmentally relevant activities (State code 22) of the State Development Assessment Provisions (SDAP) and matters under the *Environmental Protection Act 1994* that it wishes to draw to your attention.

General matters

1. Scope of works and development plans

In reviewing the application material, further clarification is needed to fully understand the scope of works and the proposed development layout. The current information does not clearly identify dredging volumes, material characteristics, or whether mooring infrastructure will be replaced. Additionally, the plans provided do not give enough detail to assess the location and extent of works.

Response requested:

Please provide:

- The total volume (m3) of dredge material (not the additional volume) and the total weight (in tonnes) to be removed, along with the density of the dredge material. Noting that the *Planning Act 2016* requires volumetric information whereas the *Environment Protection Act 1994* requires a unit of mass.
- Confirmation on whether mooring infrastructure on both the southern and northern sides will be replaced.
- Detailed and appropriately scaled drawings and/or plans showing:

  - The location of ferry concrete landing ramps, mooring infrastructure, and rock armouring.
  - Cross sections illustrating the pedestrian footpath in relation to the road widening for both the southern and northern sides.
  - Dredging cross sections.
- Engineering plans that include:
  - The location of all built structures, or structures to be modified or demolished, as a result of the proposed development.
  - Key features such as adjacent riverbanks, walls, sandbanks, structures, the limit of vegetation, relevant tidal planes (e.g. Highest Astronomical Tide (HAT), Mean High Water Springs (MHWS)) and/or other principal features of the immediate area.
  - The location and setting out details for cross-sections and any other information required to accurately define the area and to allow the site to be readily identified from the plan.
- All plans/drawings should include title, date and numbering suitable to identify the plan and should be mapped to GDA2020 projection.

2. Construction methodology

In reviewing the application material, further clarification is needed on how construction will be managed and staged, including environmental protection measures.

Response requested:

Please provide a construction methodology that includes:

- Any operational works occurring on site and expected timeframes.
- Staging of the development if applicable.
- Locations for laydown areas and stockpiles for operational works (road works and ferry ramps).
- Details of ancillary works.
- Measures employed to minimise impacts to the local receiving environment.

Environmentally relevant activity

3. Environmental risks

In reviewing the application material, further clarification is needed on how environmental risks have been assessed and managed. Under section 125(1)(l) of the *Environmental Protection Act 1994*, the application must include a technical assessment of environmental risks to the receiving environment. This assessment should cover potential impacts on air, water, noise, land, and waste and demonstrate how the avoid, minimise, and mitigate framework has been applied. This information is also required to undertake an assessment against State code 22.

Guidelines detailing the minimum information required for these assessments are available for:

- Air: Application requirements for activities with impacts to air https://www.detsi.qld.gov.au/_global/policy-register/policy-register-pdf?getdoc=1840&name=era-gl-air-impacts.pdf
- Land: Application requirements for activities with impacts to land https://www.detsi.qld.gov.au/_global/policy-register/policy-register-pdf?getdoc=1839&name=era-gl-land-impacts.pdf
- Noise: Application requirements for activities with noise impacts https://www.detsi.qld.gov.au/_global/policy-register/policy-register-pdf?getdoc=1838&name=era-gl-noise-impacts.pdf
- Water: Application requirements for activities with impacts to water https://www.detsi.qld.gov.au/_global/policy-register/policy-register-pdf?getdoc=1837&name=era-gl-water-impacts.pdf
- Waste: Application requirements for activities with waste impacts

https://www.detsi.qld.gov.au/_global/policy-register/policy-register-pdf?getdoc=1836&name=era-gl-waste-impacts.pdf.

Additionally, because the dredging activity involves the removal, transport, and placement of spoil, a Dredge Management Plan is required. This plan should align with the Dredging and Allocation of Quarry Material Guideline (https://www.des.qld.gov.au/policies?a=272936:policy_registry/cpm-gl-dredging.pdf) and provide detailed information on the dredging operation and associated environmental management measures.

Response requested:
Please provide:

- A technical risk assessment that identifies environmental values and associated risks for air, water, noise, land, and waste.
- A dredge management plan containing the following information:
  - The dredge operation including:
    - the proposed depth of extraction
    - type of equipment to be used
    - volume of bed material to be removed (in tonnes)
    - duration and timing of the dredging campaign
    - method by which the dredge spoil will be removed
    - method by which the dredge spoil will be transported
    - dredged material disposal methods
    - the method by which the spoil is to be contained within the area
    - the method by which the spoil will be dewatered
    - expected water quality parameters for any discharge
    - detail on how the dredge spoil disposal area will be made fit for future land use.
  - Operational plans to scale showing all relevant places (boundaries of dredging operation, including cross sections, estimated or modelled zone of influence of sediment plumes, location of designated disposal sites, sensitive receptors and all monitoring locations).
  - A detailed description of sediment plume-associated monitoring program including the:
    - sampling regime and methods
    - monitoring sites.
  - A detailed description of the assessment methodology to provide data in relation to trigger values that will define alert levels.
  - Clearly set out data handling and evaluation procedures that demonstrate how exceedance of alert levels will be determined.
  - Management actions to be initiated if alert levels are exceeded.

4. Sediment analysis

In reviewing the application material, further testing is needed to confirm sediment quality and manage Acid Sulfate Soils. This information is required to undertake an assessment against State code 22.

Response requested:
Please provide:

- Sediment analysis showing that the dredge material does not contain contaminants of concern in accordance with the National Assessment Guidelines for Dredging, 2009, available at: https://www.dcceew.gov.au/sites/default/files/documents/guidelines09.pdf
- Details on ongoing sampling and monitoring/management of dredge material stockpiled.
- An Acid Sulfate Soil Management Plan in accordance with the Queensland Acid Sulfate Soil Technical Manual, available at: https://www.publications.qld.gov.au/dataset/cf17fb49-0ea5-4dee-82c9-32e09bf1eab5/resource/6d880993-4b80-45e3-9110-5c24fa7a7e75/download/soil-

management-guidelines-version-5.1_1nov-2024_final.pdf. The plan should include details on the potential for acidic runoff.

5. Water quality and drainage

In reviewing the application material, further information is required to assess the application against PO13 of State code 8 and State code 22 in relation to the following statements:

- A Geotechnical investigation, prepared by GEO design, dated 10 January 2023, sampled boreholes on the southern side, including within proximity of the proposed alternative dredge spoil area. Borehole results for locations 1 & 2 indicate silty sand from 0-1.8m and marine clays from 1.8m. Within the report it is stated: *"The results of the investigation, together with our experience with similar sites in this area, indicate that the darkly hued marine clays and sands are likely to be Potential Acid Sulfate Soils (PASS). If substantial excavation of these materials is proposed, further evaluation of PASS may be required"*.
- Further cone penetrometer tests were completed on the southern and northern side, stating: *"At the time of fieldwork groundwater was encountered at depths of between about 1-2 m below the current ground level. Groundwater was not observed in some of the test locations. It is expected that groundwater levels at the site will fluctuate throughout the year based on rainfall events and tidal variations. It Is not uncommon for ground water to reach near surface levels (<1 m) following periods of prolonged rainfall, particularly when coinciding with high tides"*.
- A Basis of design engineering report, prepared by Hansen Engineering Group, dated 20 August 2025, includes existing drainage structures (culverts). It is stated: *"to accommodate additional lanes five (5) sets of culverts will need to be extended and existing stormwater will outlet into legal discharge points and the design will have minor modifications to existing stormwater catchments and drainage points".*

Response requested:

Please provide the following:

- Information demonstrating that the development is located, designed, and managed to avoid impacting the environmental values of the receiving waters, identify the water quality objectives for those waters, and incorporate siting and design measures to maintain or enhance water quality released to tidal waters in accordance with the Environmental Protection (Water and Wetland Biodiversity) Policy 2019.
- An Erosion and Sediment Control Plan (ESCP) to ensure that the construction phase will be in compliance with the Earthworks - AS3798 (Guidelines on Earthworks) and Erosion & Sediment Control – Best Practice documents as specified by the International Erosion Control Association (Australasia).
- A site based stormwater management plan in accordance with the latest edition of the Queensland Urban Drainage Manual.
- Layout and cross section plans for the culverts (if tidally influenced i.e. MHWS or below).
- An earthworks plan showing the extent of cut and fill (characterise the extent of cut and fill in m3).
- Details on how dewatering will be managed at the alternative dredge spoil area.

<u>Coastal development and tidal works</u>

6. Rock armouring

The proposed rock armouring may function as an erosion control structure, which requires further assessment under Performance Outcome (PO) PO12 of State code 8.

Erosion control structure means a structure designed to protect land or to permanently alter sediment transport processes and includes structures such as revetments (including seawalls), groynes, artificial reefs or breakwaters.

Response requested:
Please confirm whether the rock armouring meets the definition of an erosion control structure. If it does, please provide a Coastal Processes Report that explains:

- How the design reduces the severity of erosion on adjacent land.
- Its impact on sediment movement upstream and downstream of the proposed works.
- How the design minimises impacts on coastal processes and uses the minimum footprint feasible to effectively fulfil the function of the structures.

If the proposed rock armouring does not meet the definition of an erosion control structure, please provide an explanation why.

Further, please provide engineering plans (site, cross-section and demolition plans) showing the location and extent of demolition works and upgraded ferry ramps and rock armour walls, including tidal planes (HAT, MHWS etc.).

7. Dredge spoil area
In reviewing the application material, it is noted that your response to PO17 of State code 8 refers to the Environmental Assessment report which identifies the proposed dredge spoil area is in an area that has been previously cleared. However, it is unclear whether this area of cleared vegetation was undertaken lawfully.

Response requested:
Please provide evidence demonstrating that the vegetation clearing within the dredge spoil area was carried out in accordance with relevant legislative requirements.

8. Coastal processes
In reviewing the application material, further clarification is needed to demonstrate that dredging will not adversely affect coastal processes and coastal resources in accordance with PO22 of State code 8.

Response requested:
Please provide a coastal processes report for capital dredging that addresses:

- Turbidity impacts on reef and seagrass communities (if present).
- How benthic communities will not be smothered by sediments and ensure benthic habitats are not adversely impacted by changes to bed topography and hydrodynamics.
- Confirmation contaminant release limits do not exceed the levels set in the National Assessment Guidelines for Dredging (2009).
- Impacts to the bed profile of a waterway, either from dredging or disposal of dredge material, do not adversely impact coastal processes for example by interfering with sediment transport rates or pathways.

How to Respond

In accordance with section 13 of the Development Assessment Rules (DA Rules), you have three months to respond to this Information Request. The due date of a response to SARA is **17 March 2026**.

You can choose to respond to all, some, or none of the matters raised in this notice.

If you decide not to respond to the matters raised, SARA will finalise its assessment on the material provided to date in support of the application.

It would be appreciated if you would provide your response to SARA using the 'manage documents' function in MyDAS2.

If you require further information or have any questions about the above, please contact Poppy Ellis-Southwell, A/Manager, on (07) 5644 3214 or via email CairnsSARA@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely

Fletcher Smith
Principal Planning Officer, Planning Services (SEQ South)

cc Douglas Shire Council, enquiries@douglas.qld.gov.au