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Sent: Tuesday, 14 December 2021 6:35 PM
To: Enquiries
Subject: FW: submission against proposed development of North Break Port Douglas

13 December 2021

To: The Assessment Manager, Douglas Shire Council. Email: enquiries@douglas.qld.gov.au

Submission against proposed development of North Break Port Douglas

Proposal: Combined Application (Wave Park)
Applicant: Graben Pty Ltd
Application Number: CA 2021 _ 4239/1
Address of Development: 5640 Captain Cook Highway, Mowbray

I wish to lodge a submission against the proposed development of a Wave Park and Resort at 5640 Captain Cook Highway, Mowbray, comprising a wave park and ancillary facilities, a 164-room hotel, 90 self-contained units, a village precinct, a tourist park with up to 30 cabins and a helipad. I ask that the council take some more time to consider and research the environmental and social impact that this development will create.

Loss of Amenity and Scenic Values

Douglas shire is internationally known and marketed for its natural attractions – as the meeting place of the Great Barrier Reef and Wet Tropics World Heritage areas.

Visitors enter the region via a breathtakingly beautiful scenic drive. As they round Yule Point the vista opens to the sweeping Mowbray Valley hills, open cane fields and the gateway to Port Douglas. A high-density resort/wave park at this location is at odds with the area's amenity and scenic values, and is not in keeping with the region's reputation as an eco-destination known for its natural values. Is there perhaps a more suitable location for this development?

Wrong Location

- It is extremely poor practice to site developments on such low-lying coastal land adjacent to the mouth of a river. Low-lying sites, like the one proposed by the wave park, are extremely vulnerable to storm surges and rising sea-levels. Council's *Climate Hazard Adaptation Strategy (CHAS)* objectives explicitly include the need to minimise such impacts on tourism, and limit impacts on assets and infrastructure (including new developments).
- Council has a moral obligation to protect the community and its ratepayers from approving developments in such high-risk locations which are known to be highly vulnerable to inundation.
- The Douglas Shire Planning Scheme zones the proposed wave park's location as rural. A high-density resort is inconsistent with Council's scheme and in opposition to the local residents who fought hard to maintain the zoning as 'rural'.
- The high-density development and artificial aspect of a wave park in FNQ is not in keeping with the natural experience provided by the Wangetti Trail.
- The wave park will incur ongoing costs to the community associated with extending sewerage and water supplies. These will ultimately be borne by the Council and ratepayers.

Environmental Impacts

- The effects of light, noise, traffic and increased human use will negatively impact the surrounding coastal, estuarine and foreshore habitats.
- The adjoining land is designated as areas of national and state environmental significance and falls within the East Asian Australasian Flyway Path covered by international bilateral migratory bird agreements.
- The hard infrastructure is likely to significantly impact ground and surface water patterns with flow-on impacts to surrounding areas, potentially further impacting estuarine and foreshore habitats and the Great Barrier Reef.
- The proposal does not adequately acknowledge the cultural heritage values of the Mowbray delta and explain how these values in adjoining areas will be protected from flow-on impacts.

Noise Impacts

- Residents of the Mowbray Valley know from experience that noise from the highway carries up the valley and is amplified particularly with the prevailing south-easterly winds. In calm conditions residents hear cane harvesters operating and vessels heading out to sea. The noise of the Wave park and Helicopters combined will greatly impact on the residents and wildlife in this pristine area.

Lack of Public Consultation

- It is disappointing the application has been advertised for public comment at the end of the year and at the start of the Christmas holiday period.
- Few residents have seen the roadside notice which is poorly placed in a 100kph zone and obscured from northbound traffic.
- There is widespread confusion between the Port Douglas Splash Park and the wave park proposal which includes a hotel, units, village precinct, a tourist park and helipad. While the splash park is likely to provide free or low cost access to safe swimming facilities for the community; the wave park represents a much larger infrastructure development with proposed fees starting at around \$70 an hour - beyond the reach of most local families.

Community Costs and Concerns

- The proposal will impact patterns of use in the Mowbray area, with increased traffic and more tourists in this quiet rural setting.
- The social benefits for residents remain questionable due to the cost of amenities.
- The development will put further pressure on the shire's limited resource of potable water, as residents often face water restrictions?

Yours sincerely,

