

[REDACTED]

From: [REDACTED]
Sent: Monday, 31 August 2026 12:24 PM
To: Enquiries
Cc: [REDACTED]
Subject: FORMAL OBJECTION TO DEVELOPMENT APPLICATION CA-2025_5732/1

FORMAL OBJECTION TO DEVELOPMENT APPLICATION CA-2025_5732/1

**Combined Development — Workers' Accommodation, Tourist Park, Caretaker's Accommodation and Advertising Device
Lot 2 Captain Cook Highway, Lot 3 AP15871, Crees Creek and Lot 168 Endeavour Street, Port Douglas**

Dear Manager, Development Assessment,

My name is [REDACTED] and I own [REDACTED] Port Douglas. I have lived there from [REDACTED] and the property has since been rented out. My property is [REDACTED] in Endeavour St and has a stormwater drain right next to it. In my [REDACTED] years of owning this property, it flooded 3 times. The damage to the property and contents was immense and caused the residents a lot of distress.

I strongly object to this application.

My objection is not to tourism or accommodation development in Port Douglas. It is to this particular development, on this particular site, because of the significant risks it creates for neighbouring homes, Endeavour Street, Egret Close, Crees Creek and the Great Barrier Reef catchment.

I have reviewed the amended application and the concerns below are based on the developer's own documents, Council's assessment material and Council's mapping.

1. Flooding — the biggest concern

Endeavour Street and Egret Close are already within Council's mapped 100-year floodplain and Medium Hazard Storm Tide zone. The developer's own Figure 14 shows the proposed development sitting directly beside the High Hazard Storm Tide zone, with the proposed sewer crossing that zone beneath Crees Creek.

The proposal involves filling approximately **3 hectares of floodplain**. Fill displaces water; it does not make it disappear. It can reduce flood storage and alter flow paths, potentially increasing flood levels and drainage impacts on neighbouring properties.

Most importantly, **Council itself said a localised flood study was essential**. Council requested modelling of flooding before and after development, including flow paths, drainage and whether neighbouring properties would be affected.

That study has still not been provided.

Instead, the applicant says the final flood study will be completed at Operational Works stage, after approval. In other words, Council is being asked to approve the development before the actual flood impacts have been established.

That is particularly concerning given what is already happening on Endeavour Street. Two recent houses at 52 and 54 Endeavour Street were built on raised pads above approximately 3.1m ADH, and the neighbouring property at 50 Endeavour Street has subsequently become chronically waterlogged.

Whatever the precise cause, this is a clear example of why the effects of raising land in this area cannot simply be treated as theoretical.

There is also **no completed stormwater management plan**. The engineering report says stormwater arrangements will be determined at final design stage.

For a 3-hectare development on a floodplain beside a tidal creek, that is not good enough.

2. Acid sulphate soils and environmental risks

The site is within Council's Acid Sulphate Soils Overlay, yet no testing has been carried out.

The engineering report says there will be no disturbance of potential acid sulphate soils, but then acknowledges that disturbance may occur during construction of the sewer and pump station. That contradiction needs to be resolved before approval.

Acid sulphate soil disturbance can seriously damage waterways, and here the receiving waterway is Crees Creek, which drains into the Great Barrier Reef catchment.

The application also identifies protected vegetation around Crees Creek, including Category B and Category R vegetation. The proposed pump station and sewer works will require excavation, construction and access, yet no adequate assessment has demonstrated that these works can occur without disturbing protected vegetation.

The application also contains no meaningful assessment of the **EPBC Act**, despite the proximity to the Great Barrier Reef Marine Park and World Heritage Area.

3. Sewage and water infrastructure

The application bases its sewage calculations on **198 people**.

But the development's own design allows for approximately:

- 376 people in 94 cabins;
- 128 people in 32 caravan/RV sites; and
- 22 people in 11 drive-through sites.

That is approximately **526 people at design capacity** — more than twice the population used for the sewage assessment.

The applicant has also acknowledged that the downstream pump station may need upgrading, but there is no proper capacity assessment of the full sewage infrastructure chain.

The development would pump sewage into the Endeavour Street network, which connects through the St Crispin and Ulysses pump stations. No evidence has been provided that this system can safely accommodate the proposed development at realistic occupancy levels.

This is particularly concerning because the development is aimed at workers/backpackers, where actual occupancy could be considerably higher than the assumptions used in the application.

The proposed sewer also crosses directly through the High Hazard Storm Tide zone beneath Crees Creek. No proper assessment has demonstrated that the underboring can be carried out without risk to the creek, or what happens if the sewer fails during a flood.

Water supply has similarly been assessed using the 198-person figure, with no adequate assessment of firefighting capacity, storage or network capacity for 500+ additional people.

4. Rural land and planning issues

The site is zoned **Rural** under the Douglas Shire Planning Scheme and remains identified as rural production under the newly adopted Far North Queensland Regional Plan 2026.

This is not a small-scale rural or tourism use. It is a 150-site development containing 94 cabins, caravan sites, recreation facilities, a camp kitchen and major sewage infrastructure.

Council's own March 2026 decision regarding rural land in the Lower Daintree emphasised the importance of protecting agricultural land from incompatible development and rejected the argument that the closure of the Mossman Mill meant agricultural land had lost its value.

Those principles should be applied consistently here.

The applicant also argues that Workers' Accommodation can effectively be treated as a Tourist Park use, despite the Planning Scheme definition of Tourist Park expressly excluding non-resident workforce accommodation. This needs to be properly addressed.

5. Noise and residential amenity

There is **no acoustic assessment** of the impact on Endeavour Street or Egret Close.

The development could accommodate more than 500 people, with a camp kitchen, recreation area and communal facilities operating next to an established, quiet residential street.

Sound already carries from this area into Endeavour Street. Occasional private events are one thing; a permanent development with hundreds of transient residents, including hospitality workers working late shifts, is very different.

Yet there are no defined operating hours, acoustic buffer or noise management plan for the residential boundary.

Describing the site as "discrete" from the highway does not address the impact on the people who live on Endeavour Street. It simply means the development is pushed closer to us.

6. Electric ants and cultural heritage

The site is within the Electric Ant Restricted Zone and the development proposes moving approximately 2,000–2,500 cubic metres of fill onto the property.

There is no electric ant management plan, no clear identification of the source of the fill and no meaningful discussion of the applicable biosecurity controls.

Given the amount of earthmoving and machinery involved, this should be addressed before approval.

There is also no clear evidence provided of compliance with the developer's cultural heritage obligations, despite the proposed filling of a natural floodplain and directional drilling beneath Crees Creek.

7. Traffic and emergency evacuation

The application relies on the assumption that many workers will not have cars. But there is no safe, practical pedestrian or cycling route between the site and Port Douglas town centre. The Captain Cook Highway is a high-speed road with no continuous safe footpath or dedicated cycle lane.

The traffic assessment therefore needs to reflect realistic worker transport rather than assuming low car ownership.

There is also a serious emergency evacuation issue.

The development could accommodate more than 500 people on mapped flood-prone land, with a single access point onto a highway that can itself be affected by flooding.

The application does not adequately explain how people would evacuate during a flood or cyclone, whether the access route would remain usable, how emergency services would reach the site, or how workers without cars would get out.

Flood safety cannot simply be assessed by putting cabins above a nominated flood level. The safety of the whole site and its occupants needs to be considered.

Overall

This is a **150-site development on approximately 3 hectares of mapped floodplain and rural land**, beside a tidal creek and an established residential neighbourhood.

The fundamental issues have not been properly resolved.

There is still no adequate:

- flood study;
- stormwater management plan;
- acid sulphate soil assessment;
- sewage capacity assessment;
- water supply assessment;
- acoustic assessment;
- vegetation impact assessment;
- Commonwealth environmental assessment;
- electric ant management plan; or

- adequate traffic and emergency evacuation assessment.

Many of these issues have simply been deferred until Operational Works stage.

That is not appropriate for a development of this scale and in this location.

Most importantly, **Council itself said the flood study was essential before the application could be properly determined — and that study is still missing.** The sewage assessment is based on less than half the development's actual design capacity, and the proposal remains inconsistent with the rural planning context.

I respectfully ask Council to:

1. Require all outstanding technical and environmental assessments to be completed and made publicly available;
2. Give affected residents, particularly those on Endeavour Street and Egret Close, an opportunity to review and respond to those assessments; and
3. **Refuse Development Application CA-2025_5732/1.**

This is not an objection to development in Port Douglas. It is an objection to putting a large, intensive development on flood-prone rural land beside existing homes and a tidal creek without first demonstrating that its impacts can actually be managed.

Yours sincerely,

A black rectangular box redacting the signature of the person.

Port Douglas