

[REDACTED]

18/08/2026

[REDACTED]
Chief Executive Officer
Douglas Shire Council
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RE: Objection to Development Application CA 2025_5732
Proposal: Material Change of Use (Undefined Use - Workers' Accommodation) and Tourist Park
Location: Lot 2 Captain Cook Highway (including Lot 168 Endeavour Street and Lot 3 AP15871)

Dear [REDACTED]

We write formally as the owners [REDACTED] of the [REDACTED] to lodge an objection against the amended development application CA 2025_5732.

Our objection to this proposal is due to its physical, environmental, hydraulic, and visual impacts of the proposal on the local area. We raise the following critical grounds for refusal:

1. Visual Impact and Incompatibility with the Rural Landscape

The site is located within an area mapped with High and Medium Landscape Values along a primary tourism gateway. The scale and intensity of the proposed high-density commercial structures, comprising 94 cabin sites, RV and camping areas and extensive management facilities, are entirely out of character for the rural landscape interface. Furthermore, the required large-scale site filling and elevated pads will create a prominent visual scar, turning a sensitive rural corridor into an urbanized eyesore.

2. Unresolved Floodwater Displacement and Significant Earthworks

The application involves significant earthworks across a ~3-hectare footprint, requiring a minimum habitable floor level of 3.314 metres AHD. This extensive filling of natural flood storage capacity directly threatens surrounding areas, including Endeavour Street and Egret Close, with increased flood heights and velocity changes.

- a. We strongly contend that a final, completed hydraulic and flood modelling study addressing specific impacts on neighbouring properties must be

required before any approval is granted—not conditioned after approval as previously requested by the applicant's engineer.

- b. The strict "No Worsening" provisions of the FNQROC Regional Development Manual must be rigorously enforced, and any approval granted without complete, verifiable flood and drainage modeling would constitute a severe planning oversight.

3. Wastewater Infrastructure Capacity and Crees Creek Under-Bore Risks

The proposal intends to under-bore Crees Creek to pump all wastewater from approximately 150 sites (exceeding 500 persons at full capacity) directly into the municipal pump station located on Lot 168 on Endeavour Street. This raises critical infrastructure and environmental concerns.

- a. **Peak Capacity:** There is no clear demonstration that the Lot 168 pump station can handle the additional peak capacity from the proposed development creating severe risks of surcharging and raw sewage backups into residential properties.
- b. **Pipeline Failure and Environmental Harm:** Under-boring directly beneath the bed of Crees Creek presents catastrophic environmental risks. Without mandated structural monitoring systems, automatic shut-off valves, and rigorous emergency containment measures, a submerged pipe rupture or pump station overflow would discharge raw sewage directly into the Crees Creek estuary.

If the proposal was to be approved there should a condition that the wastewater pipeline follows a route along Captain Cook Hwy to existing infrastructure at Craigie, reducing the impact on the creek.

4. Acid Sulfate Soils (ASS) and Estuarine Environmental Risks

The proposed sewer line under-bore traverses a highly sensitive estuarine creek bed. The application lacks sufficient, transparent mitigation protocols to ensure that Potential Acid Sulfate Soils (PASS) are not disturbed, oxidized, or allowed to leach heavy metals into the aquatic ecosystem of Crees Creek.

5. Lack of Demonstrable Need and Competitive Imbalance

The applicant claims a need for workers' accommodation; however, our established caravan park frequently experiences periods of low cabin occupancy. This clearly demonstrates there is no genuine regional shortage of tourist cabin capacity. If this proposal is truly intended to address a critical workforce housing bottleneck, it must be subject to a legally binding quota restricting the usage of these units exclusively to long-term workers. Without such a requirement, the project functions as standard commercial tourism development, unnecessarily cannibalizing the existing, under-utilized market and violating the rural zoning intent.

6. Road Access and Intersection Safety Hazards

The development relies entirely on a single access point via an unnamed road connecting directly to the Captain Cook Highway. Introducing high volumes of mixed traffic—including heavy vehicles, RVs, and worker commuter vehicles—creates severe turning and safety hazards close to the existing Port Douglas Road intersection as well as the bends in the highway. Drawing on [REDACTED] experience [REDACTED] tourists driving large caravans who are unsure of their exact location often hesitate or make sudden maneuvers when trying to find the entrance off a fast-moving arterial route, creating severe traffic risks that necessitate dedicated turning lanes and lighting.

The proposals reliance on historical, unexecuted roadwork conditions highlights that necessary external intersection upgrades are neither funded nor secured upfront, making the site prematurely accessible.

7. Commercial Viability, Financial Risk, and Abandonment Hazard

Based on comprehensive infrastructure, civil earthworks, and highway intersection requirements, we estimate that the total capital expenditure for this development could conservatively be estimated at \$35 million. Given highly seasonal regional tourism demand and the high costs associated with massive site-filling, estuarine under-boring, and arterial road upgrades, it is highly unlikely that this project is financially feasible or capable of generating a viable return on investment. This reality explains why fewer than 10 greenfield caravan parks have been successfully developed across Australia in the past 10 years. There is a severe risk that the heavy financial burden will stall construction halfway, leaving behind an abandoned, half-finished development scar along a primary tourism gateway—similar to troubled, stalled resort sites seen previously in Far North Queensland.

Conclusion

The proposed development introduces unacceptable traffic hazards, severe flood displacement and infrastructure risks, potential environmental degradation of Crees Creek, and prominent visual impacts that degrade the scenic values of the corridor, alongside unacceptable economic abandonment risks.

We respectfully request that the Council refuse Development Application CA 2025_5732 in its entirety.

Kind regards,

[REDACTED]