

To: enquiries@douglas.qld.gov.au

Subject: Submission Objecting to Development Application CA 2025_5732/1

Submission on Development Application CA 2025_5732/1

Submission Maker: [REDACTED]

Residential Address: [REDACTED]

Postal Address: As above

Email Address: [REDACTED]

Phone: [REDACTED]

Dear Assessment Manager,

I lodge this submission regarding Development Application **CA 2025_5732/1** for a Material Change of Use for Workers' Accommodation, Tourist Park, Caretaker's Accommodation and Associated Facilities at Lot 2 Captain Cook Highway, Port Douglas.

I object to the application in its current form and request that Council give careful consideration to the issues outlined below before determining the application.

Ground 1: Flooding, Storm Tide and Flood Displacement

Facts and circumstances relied upon

The application acknowledges that the site is affected by flood and storm tide hazards and proposes filling of parts of the site to achieve development levels. The development is located adjacent to Crees Creek within a low-lying coastal environment.

I am concerned that insufficient publicly available information has been provided to demonstrate that:

- Raising development areas will not displace floodwaters onto neighbouring land;
- Flood storage capacity will not be reduced;
- Flood depths and flow velocities will not increase elsewhere;
- The combined impacts of creek flooding, storm tide inundation and future sea-level rise have been adequately assessed;
- Neighbouring properties will not experience increased flood impacts as a result of the development.

Given the scale of the proposed development and the acknowledged flood constraints affecting the site, I request that Council require detailed hydraulic modelling and independent verification

demonstrating that no adverse flood impacts will occur on neighbouring properties or environmental areas.

Ground 2: Environmental Impacts on Crees Creek and Adjacent Mangroves

Facts and circumstances relied upon

Crees Creek and the adjoining mangrove and riparian environments form an important ecological system adjacent to the proposed development area.

Although the applicant has located the development footprint on previously cleared land and seeks to avoid direct vegetation clearing, concerns remain regarding indirect environmental impacts associated with a large accommodation development adjoining a sensitive coastal waterway.

Potential impacts include:

- Increased stormwater runoff;
- Reduced water quality entering Crees Creek;
- Sedimentation during construction;
- Increased noise and lighting impacts;
- Increased recreational pressure on adjacent environmental areas;
- Long-term impacts on creek and mangrove ecosystem health.

I do not believe sufficient information has been publicly provided to demonstrate that these impacts can be avoided or effectively managed over the life of the development.

I request that Council adopt a precautionary approach and require further assessment of the long-term environmental impacts on Crees Creek, adjacent mangrove systems and downstream estuarine environments.

Ground 3: Threatened Species, Migratory Species and Habitat Connectivity

Facts and circumstances relied upon

The publicly available material does not clearly demonstrate that comprehensive threatened species surveys or habitat assessments have been undertaken for the Crees Creek and mangrove corridor adjoining the development.

While the documentation discusses vegetation mapping, fish habitat mapping and marine plants, it does not clearly demonstrate assessment of:

- Threatened species protected under the EPBC Act;
- Species protected under Queensland nature conservation legislation;
- Migratory birds and shorebirds;
- Habitat connectivity and wildlife movement corridors;
- The impacts of lighting, noise and increased human activity on wildlife.

The Crees Creek corridor functions as a wildlife movement pathway and ecological connection between riparian, mangrove and tidal habitats.

I request that Council require additional ecological assessment and make any threatened species findings publicly available prior to determining the application.

Ground 4: Sewer Infrastructure and Environmental Risk

Facts and circumstances relied upon

The proposal includes sewer infrastructure required to connect the development to the existing sewer network.

I am particularly concerned about the location of the proposed sewer infrastructure in proximity to existing residential properties, flood-prone land and environmentally sensitive waterways.

The publicly available material does not clearly demonstrate:

- The final sewer alignment;
- Potential impacts on neighbouring properties;
- Long-term maintenance arrangements;
- Flood resilience measures;
- Emergency overflow management;
- Environmental protection measures in the event of failure.

Given the proximity of sewer infrastructure to Crees Creek and adjoining mangrove environments, there is potential for significant environmental impacts should failures occur during extreme rainfall, flooding or storm tide events.

Further information should be required before any approval is granted.

Conclusion

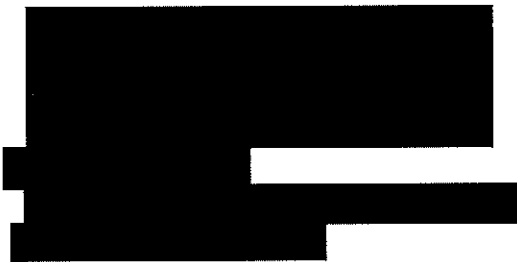
I respectfully request that Council not approve the application until it is satisfied that:

- Flood storage and flood displacement impacts have been comprehensively assessed;
- Storm tide and climate resilience issues have been adequately addressed;

- The environmental values of Crees Creek, adjacent mangroves and connected habitats will be protected;
- Adequate threatened species and habitat assessments have been completed;
- Sewer infrastructure impacts on neighbouring residents and environmental values have been fully assessed and mitigated.

Given the environmental sensitivity of the location and the acknowledged flood and storm tide constraints affecting the site, I believe a precautionary approach is warranted.

Yours faithfully,

A large black rectangular redaction box covering the signature and name of the sender.

18.08.2026