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**From:**

**Sent:**

[REDACTED]  
Thursday, 27 August 2026 10:41 AM

**To:**

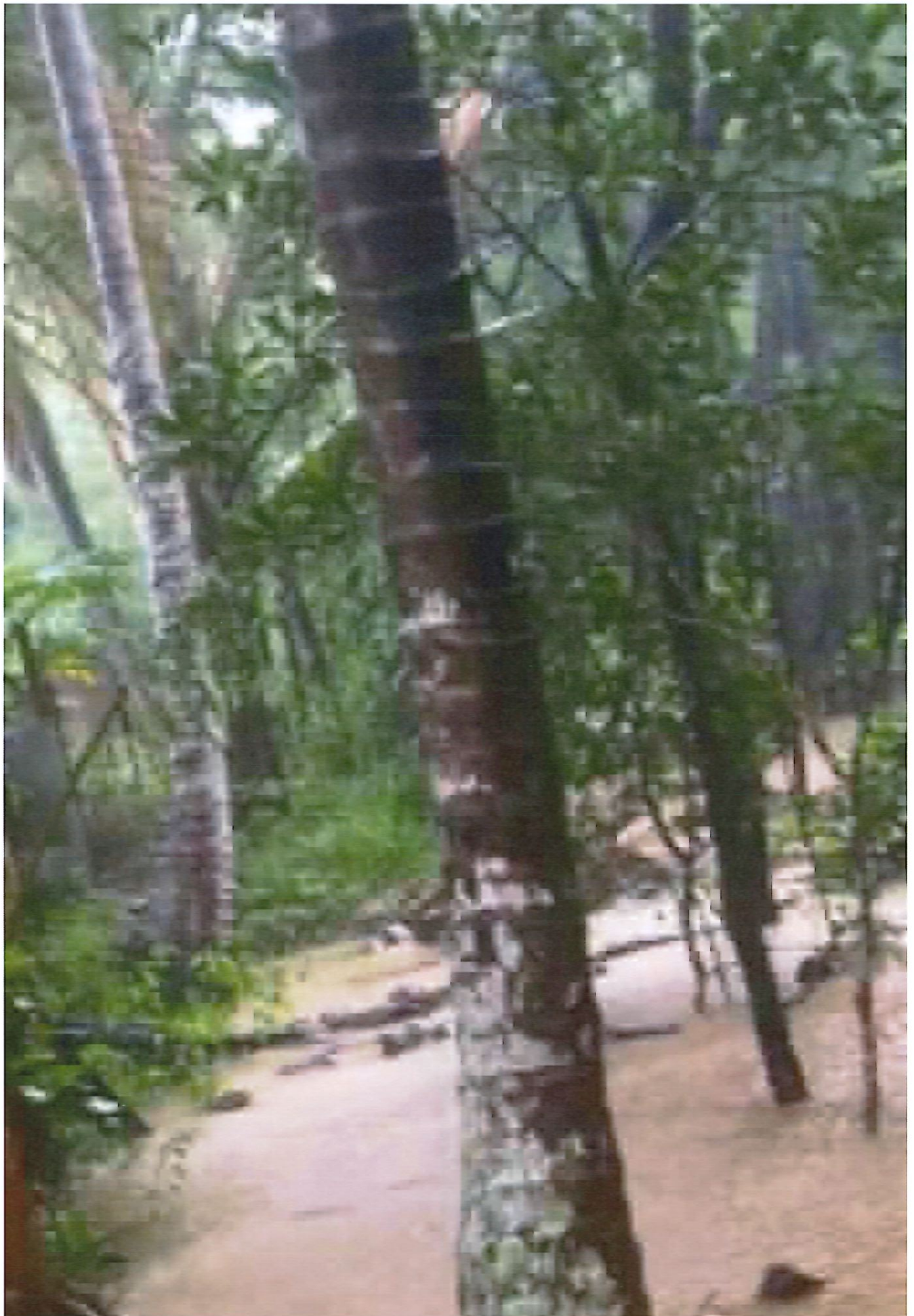
Enquiries; [REDACTED]

**Subject:**

Development Application CA2025\_5732/1

**Attachments:**

Properly Made Submission.docx









18 August 2026

Manager, Development Assessment

Douglas Shire Council,

We are writing to formally raise our concerns regarding the proposed development adjoining the Endeavour Street and Egret Close residential area.

Our concerns are not simply about the scale of the development. They relate to significant potential impacts on flooding and drainage, sewage infrastructure, noise, residential amenity and the existing character of our neighbourhood. Based on the information provided with the application, we do not believe these matters have been adequately assessed to allow Council to properly determine the potential impacts on the surrounding residents.

#### **Flooding, Drainage and filling of proposed site:**

Our residential area is already vulnerable to flooding. Council's own planning mapping identifies the area as being within the mapped 100 Year Flood Zone and Storm Tide Medium Hazard. This is not merely a theoretical concern. During the last two major rain events, water rose all the way to our back gate on Crees Creek side of our property. Having personally witnessed water reach this level on two occasions, We are extremely concerned about what may happen if a substantial area of the adjoining floodplain is filled and raised.

The proposed development involves placing approximately 2,000-2,500 cubic meters of fill across approximately three hectares of floodplain. Placing this much volume of material onto a floodplain does not remove floodwater from the system, it reduces the area and volume available for floodwater to spread and be temporarily stored. That water must ultimately be displaced elsewhere.

For residents whose properties are already experiencing floodwater approaching their boundaries, the obvious question is:

**What impact will raising approximately three hectares of floodplain have on flood levels, flood behaviour, flow paths and the depth or duration of flooding on surrounding residential properties, including Endeavour Street and Egret Close?**

This question needs to be answered through appropriate flood modelling **before the development is approved**, not afterwards.

Of particular concern is that Council's own Senior Planning Officer has previously stated in writing that approval cannot be granted without a completed flood study. Despite this, the required flood study has still not been provided.

The proposal that the flood study could instead be completed following approval, with fill levels subsequently adjusted if necessary, appears entirely contrary to the purpose of undertaking such an assessment. The flood study should inform Council's decision about whether the

development and proposed filling are acceptable in the first place. Approval should not be granted first and the potential consequences determined afterwards. Once thousands of cubic meters of fill are placed onto a floodplain, the consequences for neighbouring properties cannot simply be treated as an issue to resolve later.

We therefore request that council require a **completed and independently reviewed flood and stormwater assessment before any development approval is granted**, specifically addressing:

- The effect of approximately three hectares of proposed filling on existing flood storage;
- Changes to flood levels and flood depths;
- Displacement of floodwater onto adjoining and nearby properties;
- Changes to existing overland flow paths;
- Impacts on Crees Creek and surrounding drainage;
- Cumulative impacts during major rainfall combined with elevated creek or tidal conditions;
- The potential effect on properties within Endeavour Street and Egret Close.

#### **Stockpiling of Fill Prior to Development Approval:**

We are also concerned that **fill material is already being stockpiled on or in connection with development site despite the development application not yet having been approved.**

Given that the proposed development involves approximately 2,000-2,500 cubic meters of fill across around three hectares of floodplain, the stockpiling of fill prior to determination of the application creates a reasonable concern for surrounding residents that preparations may already be underway for works that remain subject to Council assessment and approval.

This is particularly concerning because the **flood study that Council's own Senior Planning Officer indicated was required before approval has still not been completed.**

The proposed filling of this land is one of the matters that should be assessed through that flood study. The study needs to determine what effect raising portions of the floodplain could have on flood storage, flood levels, flow paths and neighbouring properties.

As a nearby resident who has seen floodwater reach [REDACTED] on Crees Creek side, I consider this a serious issue.

We therefore request that Council **investigate the current stockpiling of fill**, confirm whether any approvals are required for that activity, and confirm that **no placement, spreading or other use of fill associated with the proposed development will occur unless and until the necessary development approvals and flood assessments have been completed.**

We also request that the existence and location of any fill already brought onto the site be taken into account in the flood assessment, particularly if it is currently located within an area that provides flood storage or conveys floodwater.

## **Sewerage Infrastructure and Crees Creek:**

We are also concerned about the proposed sewerage infrastructure associated with the development.

The proposal involves boring a **pressure sewer main beneath Crees Creek**, a tidal waterway located within a High Hazard Storm Tide area, to connect the development to the existing pump station on Endeavour Street.

The sewage calculations appear to have been based on approximately **198 persons**, despite the development potentially accommodating **526 or more people at full capacity**.

That discrepancy requires proper explanation.

No satisfactory capacity assessment of the existing Endeavour Street pump station appears to have been provided demonstrating that it can reliably accommodate the additional load generated by the development.

The project engineer has acknowledged that pump upgrades may be required. Again, however this proposed to be resolved following approval.

For infrastructure of this importance, particularly infrastructure involving a pressure sewer beneath a tidal creek and an existing pump station servicing the surrounding area, the adequacy and capacity of the system should be demonstrated **before approval is granted**.

Council should require a full sewerage infrastructure and pump station capacity assessment based on the **maximum potential occupancy of the development**, rather than assumptions based on substantially lower occupancy.

## **Noise and Residential Amenity:**

Endeavour Street and Egret Close are quiet, established residential streets. They are home to families and long-term residents who have chosen to live here because of the peaceful environment, natural surroundings and existing residential character.

The proposed development would introduce accommodation for potentially **500 or more people**, together with a permanent camp kitchen, recreation areas and communal facilities immediately adjoining an established residential area with only a waterway separating them with noise electrified over water.

A significant proportion of the occupants are expected to be hospitality workers. Hospitality employment commonly involves afternoon, evening and late-night shifts. It is reasonable to expect that residents returning from work at these times will use communal and recreational areas outside conventional daytime hours.

This is not a criticism of future occupants. It is simply a foreseeable consequence of placing a large worker accommodation development and its communal facilities alongside an established residential neighbourhood.

Despite this, within the approximately **367 pages of amended application material**, there appears to be **no acoustic assessment specifically examining the impact of the development on Endeavour Street and Egret Close**.

The application instead appears to rely on a brief statement that impacts will be “minimal”, without the detailed technical assessment necessary to demonstrate that conclusion.

There appears to be:

- No clearly defined operating hours for the camp kitchen and recreation hours;
- No acoustic assessment of noise experienced at neighbouring residential properties;
- No meaningful acoustic buffer proposed along the residential boundary; and
- No detailed noise management plan dealing with late-night activity and communal areas.

We have direct experiences of how readily sound travels through this area especially across the waterway (Crees Creek) from adjacent properties. Music from occasional private events in the surrounding area can already be clearly heard from our backyard and on occasions our neighbours have knocked on our door to ask us to keep the noise down, incorrectly believing that the noise was coming from our property.

Those events are temporary and infrequent. A permanent development accommodating potentially more than **500 people**, with communal recreation and kitchen facilities, represents a substantially different and ongoing noise environment.

The developer also describes the development as being positioned back from Captain Cook highway. While this may reduce its relationship with the highway, moving the development further away from the highway necessarily places parts of the development closer to the existing residential area.

The resulting impact on Endeavour Street and Egret Close therefore needs to be properly assessed rather than assumed to be minimal.

We request that council require a **formal acoustic impact assessment before any approval is granted**, specifically considering impacts on residences in Endeavour Street and Egret Close.

Any approval should also include enforceable conditions addressing operating hours, outdoor communal and recreation areas, amplified music, late-night activity, acoustic screening and an appropriate ongoing noise management plan.

### **Existing Residential Character:**

We chose to live in this area because of its **peace, natural environment and residential character**.

We recognise that development occurs and that accommodation for workers may be required within the region. However, the need for development does not remove the responsibility to properly assess its consequences for the people who already live beside it.

A development of this scale has the potential to permanently change the character and amenity of the surrounding residential area.

More importantly, some of the unresolved issues – particularly flooding and sewage infrastructure have consequences extending beyond amenity. They potentially affect the safety, property and wellbeing of existing residents.

These matters should therefore be established through appropriate technical studies before council makes its decision.

## **Request to Council**

We respectfully request that **no approval be granted until Council has received and properly assessed:**

1. A completed flood and stormwater study addressing the proposed filling of approximately three hectares of floodplain and the resulting impacts on neighbouring residential properties, Crees Creek and surrounding flood behaviour.
2. A full sewerage infrastructure capacity assessment based on the development's maximum potential occupancy, including confirmation of capacity of the existing Endeavour Street pump station and any upgrades required.
3. An acoustic impact assessment specifically addressing noise impacts on **Endeavour Street and Egret Close**, including camp kitchen, recreation areas, communal facilities and late-night activity.
4. Appropriate enforceable conditions existing residents from unacceptable noise, flooding, drainage and infrastructure impacts.

The most important issue is that these assessments are completed before approval, while council still has the opportunity to properly understand the consequences of the proposal and determine whether the development, its scale and its proposed filling are appropriate.

Residents should not be placed in a position where potentially serious flooding, infrastructure or amenity impacts are identified only after approval has been granted.

We also request that Council investigate **the stockpiling of fill already occurring on or in connection with the site prior to development approval**, determine whether this activity requires approval and ensure that it does not alter existing flood storage or flood behaviour.

Finally, we request that this correspondence be accepted as **properly made submission** in relation to the development application.

We also request that we be **formally notified of Council's decision** on the application and provided with all applicable **submitter and appeal rights**.

Yours faithfully,

