

From: [REDACTED]
Sent: Tuesday, 25 August 2026 5:37 PM
To: Enquiries
Subject: Formal Objection – CA2025-5732 and CA2025-5732/1

To whom it may concern,

I make the following submission in respect of development applications CA2025-5732 and CA2025-5732/1.

I object to Douglas Shire Council approving these applications on the following grounds.

1. Flooding and impacts on neighbouring properties

The subject land is currently zoned Rural Residential/Residential and forms part of a larger area that is known to be subject to extensive flooding.

The proposed development has the potential to directly affect residents of Endeavour Street, Eagret Street and surrounding streets by altering existing drainage patterns, reducing flood storage and potentially increasing flood levels and flood impacts on neighbouring properties.

I request that Council confirm:

- Has a hydraulic assessment been undertaken for the proposed development?
- What are the minimum and maximum existing and proposed flood levels?
- Has a hydrological assessment been undertaken?
- Has a comprehensive flood impact assessment been undertaken?
- Has Council assessed the cumulative impact of the proposed development on surrounding properties?

2. Loss of flood storage and alteration of natural drainage

The developer proposes to raise the site by approximately 3 metres above sea level, requiring approximately 3 metres of fill. This is understood to displace approximately 90,000 cubic metres of existing flood storage capacity.

Development on a floodplain should not proceed where changes to the landform, drainage or flood storage capacity would adversely affect neighbouring properties or increase the risk or severity of local flooding.

The proposed filling has the potential to significantly alter existing flood behaviour, reduce available flood storage and redirect floodwaters towards neighbouring properties.

The existing land also performs an important natural runoff and drainage function. Crees Creek and other drainage paths and waterways receive and convey runoff from the surrounding catchment. The existing drainage system is already inadequate to manage current runoff, and the proposed development would place additional pressure on this system.

There have been significant historical flooding events affecting Crees Creek, including flooding associated with Cyclone Jasper in 2023 and Cyclone Owen in 2018. During these events, floodwaters reportedly entered the backyards of properties along lower Endeavour Street and surrounding roads. Photographic evidence is available.

Given this history, a comprehensive assessment should demonstrate that the proposed development will not reduce flood storage, obstruct existing flow paths, increase flood levels or increase flood risk to neighbouring properties.

3. Suitability and access for the proposed accommodation

The proposed development would provide basic backpacker accommodation comprising bungalows, cabins and caravan-style accommodation.

The isolated location raises concerns regarding safe access for occupants, particularly backpackers who may need to travel to Port Douglas for employment.

Access by bicycle would require travel along or near the Captain Cook Highway and the Port Douglas turn-off, including areas with limited visibility and significant traffic. This raises legitimate safety concerns for people travelling to and from the development, including workers travelling during early morning, evening and night-time periods.

Council should assess whether the proposed location provides safe and practical transport access for the anticipated number of residents.

4. Impact on residential amenity and land use

The proposed number of cabins, caravans and occupants has the potential to significantly alter the existing character and amenity of adjoining properties, including properties along the Captain Cook Highway.

The development would introduce a substantially more intensive commercial accommodation use into an area currently characterised by residential and rural-residential uses.

Council should clarify the planning basis for the proposed use and whether a rezoning or other change to the existing planning framework is required or contemplated.

5. Sewerage infrastructure and environmental risk

The proposed development could accommodate more than 500 people and would require a new sewerage pipeline beneath Crees Creek connecting to the existing pump station located between 18 and 20 Endeavour Street.

I am concerned that no assessment has been provided demonstrating that the existing pump station and sewer network have sufficient capacity to accommodate the additional load generated by the proposed development.

Wet-weather events can result in additional inflow and infiltration into sewer networks, substantially increasing flows. If the existing infrastructure is already compromised or operating near capacity, additional flows could potentially overwhelm the system.

A sewer failure or overflow could result in untreated sewage entering Crees Creek and the surrounding sensitive marine, riparian and mangrove ecosystems, as well as causing sewage to surcharge or back up into household drains.

Given the scale of the proposed development and the environmental sensitivity of Crees Creek, Council should require an independent assessment of the existing sewer network, including pump-station capacity, pipe condition, wet-weather capacity, inflow and infiltration, and potential overflow pathways.

Council should also clarify exactly what sewerage infrastructure the developer proposes to construct and how the additional load will be managed.

6. Native Title and cultural values

Crees Creek and the surrounding mangrove areas are associated with significant cultural and environmental values.

The Eastern Kuku Yalanji People #2 native title claim (QUD356/2022) covers a substantial area of the Douglas Shire, subject to the boundaries and exclusions recorded by the National Native Title

Tribunal. The area is also of significance to the Eastern Kuku Yalanji and the Kubirriwarra Traditional Owners. These cultural and Native Title interests should be properly identified and considered as part of the assessment of the proposed development, particularly where works are proposed in or near Crees Creek, its waterways, banks and mangrove ecosystems.

Conclusion

Given the significant flood history of the area, the proposed removal of approximately 90,000 cubic metres of flood storage, the existing inadequacy of the drainage system, the proposed sewer crossing beneath Crees Creek, the potential sewerage and environmental risks, and the potential impacts on neighbouring residents and cultural values, I respectfully request that Council not approve the applications unless these matters have been comprehensively assessed and it can be demonstrated that the development will not increase flood, drainage, environmental, infrastructure or public safety risks.

I request that Council provide the relevant hydraulic, hydrological, flood, drainage and sewerage assessments relied upon in considering these applications.

Regards,