

[REDACTED]

From: [REDACTED]
Sent: Saturday, 22 August 2026 12:02 AM
To: Enquiries; [REDACTED]
Subject: FORMAL OBJECTION TO DEVELOPMENT APPLICATION CA 2025_5732/1

Manager, Development Assessment

Douglas Shire Council
64-66 Front Street, Mossman QLD 4873
enquiries@douglas.qld.gov.au,

PROPERLY MADE SUBMISSION

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
Applicant: Krystal Marie DeMenna

My name is [REDACTED] and I live at [REDACTED] I have lived at this address for over [REDACTED] years, and i have been in Port Douglas for just over [REDACTED] years.

My property is [REDACTED] the boundary of the subject site. I am a properly made submitter under the Planning Act 2016 (Qld) and I ask that I be notified of all decisions and appeal rights arising from this application.

I strongly object to this application. I want to be clear that my objection is not to tourism or to accommodation development in Port Douglas. It is to this specific development, on this specific site, in a location that poses real and unassessed risks to my home, my street, Crees Creek, and the Great Barrier Reef.

I have read the full amended application. Every concern I raise is sourced from the developer's own documents, Council's own assessment process, or Council's own statutory mapping.

I respectfully ask that this application be refused, not deferred, with clear reasons that this flood-prone rural land cannot be reconsidered for development.

1: My Street Is Already a Flood Risk Area — This Development Makes It Worse

Endeavour Street and Egret Close are in a flood zone. The DSC Flood and Storm Tide Inundation Overlay Map Sheet FST-020 formally identifies both streets as within the 100 Year ARI floodplain and the Storm Tide Medium Hazard zone.

The developer's own Figure 14 — the Flood and Storm Tide Inundation Overlay from the July 2026 amended application — confirms this. The development boundary sits exactly on the High Hazard Storm Tide zone, and the yellow dotted sewer main line crosses straight through that High Hazard zone under Crees Creek.

The developer is proposing to fill a 3-hectare floodplain that drains toward streets already in a Medium Hazard Storm Tide zone, with a sewer main crossing through a High Hazard zone, without a completed flood study showing what happens to us when they do it.

This is precisely the scenario the Flood and Storm Tide Hazard Overlay Code exists to prevent.

2: The Flood Assessment Is Incomplete — Council Said So Itself

The scale of the earthworks

The developer proposes to fill approximately 3 hectares — 30,000 square metres — of mapped floodplain. At the larger lot sizes typical of Endeavour Street, that's equivalent to filling 20 residential blocks. At the smaller lot sizes more common in newer Port Douglas developments, it's closer to 50. An entire suburb.

The developer's own December 2025 information response confirms 2,000–2,500 cubic metres of fill will be required. Fill placed on a floodplain doesn't make water disappear — it displaces it.

Building up 3 hectares of a floodplain by 3 meters right next to a tidal creek system reduces the floodplain's water storage capacity and acts as a solid barrier. It narrows the flow path and displaces roughly 90,000 cubic meters of flood storage. This forces displaced flood and storm tide waters laterally and downstream, raising peak flood levels, accelerating flow velocities, and worsening inundation hazards for the existing residential lots across the creek. Yet the study council requested has not been done.

The proposed fill level sits at or below the upper end of the present day storm tide range. Council's own adopted study suggests it may already be insufficient — before we even consider climate projections.

Council's assessment officer said approval cannot proceed without this study

This is not my opinion. It is Council's own written position, stated clearly in the formal information request to the applicant:

"It is not agreed that the flood considerations for the development can be suitably addressed without a localised flood study, nor that conditions of any approval can be determined prior to the flood study being provided. Given the extent of mapped flood over the land, the provision of a local flood study is essential for assessment of the application."

Council asked for a study that models the 100-year flood event pre- and post-development, flow paths, internal drainage, and — critically — confirmation that the development will not increase runoff or direct water into neighbouring properties.

The applicant's response, repeated verbatim in Appendix R of the July 2026 amended report:

"The final flood study will be completed at OWA stage once the cut and fill plan has been modelled to determine if the final fill levels have caused any afflux in the surrounding area and what may be needed to reduce the effect of any afflux. Fill levels can, if required, be adjusted at OWA stage."

The developer is asking Council to approve first and study the flood impacts later.

Council's own officer said approval cannot be determined without this study. The study has still not been provided.

The flood study only looks inward

Even the draft flood study that has been provided focuses entirely on the development itself — making sure the cabins are above water. It contains no modelling, no analysis, and no assessment of what the 2,000–2,500 cubic metres of fill does to overland flows affecting Endeavour Street and Egret Close. That is the one question that matters most to the people who live here, and it remains completely unanswered.

There is no stormwater management plan

Appendix H of the engineering report states:

"Stormwater from the development will be handled by both surface and underground systems... All of this will be determined at final design stage."

A development on a 3-hectare floodplain on a tidal creek, next to streets that are already in danger of flooding, has no stormwater management plan. It will be worked out after approval.

3: Acid Sulphate Soils — No Testing, and a Contradiction in Their Own Documents

The site is within the Acid Sulphate Soils Overlay. The overlay is Council's pre-existing mapping that flags the risk. It does not tell us what is actually in the ground, at what depth, or what happens if it is disturbed. The only way to know that is to test.

The engineering report (Appendix H, OSE Group, page 3) says:

"There is a possibility of acid sulfate soils existing below the surface. No acid sulfate testing has been carried out as it is not considered necessary for the project as no disturbance of PAS will be undertaken. Existing ground, below the 1% AEP level will be filled to the required level without disturbance. The only possibility of disturbance to PAS may occur during construction of the internal gravity sewer system and pump station."

In the same paragraph, the engineer says no disturbance of Potential Acid Sulphate soils will occur — and then says disturbance may occur during sewer and pump station construction. That is a direct contradiction in their own document.

The amended report says compliance with "accepted standards and relevant conditions." No standards are named. No testing has been done.

When acid sulfate runoff enters a creek it triggers severe water acidification, releases toxic heavy metals and aluminium, strips oxygen from the water, and can stimulate noxious marine algal blooms, severely degrading coastal and marine ecosystems. This creek drains into the Great Barrier Reef catchment.

4: The Sewage Infrastructure Has Not Been Properly Assessed

The population figure is less than half the actual design capacity

Every sewage calculation in this application is based on 198 people. But the development's own design shows:

- 94 cabin sites × 4 persons = 376 people
- 32 caravan/RV sites × 4 persons = 128 people
- 11 drive-through sites × 2 persons = 22 people
- Total at capacity : approximately 526 people

The 198 people figure is less than half the cabin population alone. No explanation has been provided for this discrepancy, and Council's own information request required calculations to be substantiated by appropriate detailed studies. They have not been.

The engineer's own response acknowledged the downstream pump station "may result in requiring the pumps to be upgraded" — an admission that the existing infrastructure may be inadequate, left to be resolved after approval.

I object to the proposed wastewater plan on the grounds that it creates unacceptable hydraulic bottleneck and environmental failure risks for the local sewage infrastructure. The applicant proposes to pump pressurized effluent directly into the Lot 168 / Endeavour Street sewage pumping station (SPS) network. The Endeavour Street catchment is a small, capacity-constrained gravity system that relies on gravity flow to transition down to the St Crispin line.

Discharging a pressurized private pump line into a low-capacity gravity configuration creates a critical hydraulic conflict. The gravity lines cannot clear the immediate, heavy instantaneous volume generated by a 150 site development, which represents approximately 500 Equivalent Persons (EP) at peak capacity. This artificial pressure will lead to severe hydraulic surcharging,

causing raw sewage to back up into household drains and overflow into local streets. Furthermore, given the proximity to Crees Creek, any wet-weather Stormwater Inflow and Infiltration (I&I) will overwhelm this compromised line, resulting in raw sewage spilling directly into a sensitive marine and riparian ecosystem.

There is a further consideration. Backpacker accommodation in Port Douglas — the market this development explicitly targets — commonly operates at significantly higher densities than 4 persons per room. If even a proportion of the cabins were to operate at 8 persons per cabin, consistent with existing backpacker accommodation in town:

- One quarter of cabins at 8 persons: total occupancy rises to approximately 648 people
- One third of cabins at 8 persons: total occupancy rises to approximately 724 people

At 648 people, the 198 people sewage figure represents less than one third of the actual load. The sewage capacity assessment should be based on the most highest realistic occupancy rates, not the lowest one.

A sewer main crossing a High Hazard Storm Tide zone

As shown on Figure 14 of the amended application, the proposed sewer main crosses directly through the High Hazard Storm Tide zone beneath Crees Creek. Crees Creek is tidal at this location.

The applicant argues the underbore doesn't trigger SARA referral because it "does not disturb the bed of tidal water." But that exclusion only applies if the bed is genuinely undisturbed. No geotechnical assessment of the creek bed has been provided. The final design hasn't been completed. Underboring in soft estuarine sediments carries real risk of inadvertent disturbance or frac-out. The entry and exit pits require surface works adjacent to the creek. None of this has been assessed.

A sewer pipe failure during a wet season flood event — when the creek is most dynamic and the system most stressed — means raw sewage discharging directly into a tidal waterway connected to the Great Barrier Reef Marine Park.

Council already rejected this infrastructure claim once

Section 8.02 of the amended report repeats, word for word, the same infrastructure assertion that Council's own information request specifically rejected: that the development will not compromise the "operational integrity" of existing infrastructure. Council said a concept layout is not acceptable and required a full engineering assessment. The applicant has provided the same assertion without the evidence.

It is understood that the Endeavour Street pump station discharges to the St Crispins pump station, which in turn discharges to the Ulysses pump station. No capacity assessment has been provided for any of these three pump stations in the chain.

If upgrades are required to any or all of them to service this development — which sits outside Council's Priority Infrastructure Area and was never planned for in Council's infrastructure network — it is unclear whether the cost of those upgrades will be borne by the developer or by Douglas Shire ratepayers.

Can Council confirm what infrastructure upgrades are required across the full pump station chain and who bears the cost?

I also note that Council has commissioned an independent peer review of the engineering — confirmed in writing by the Senior Planning Officer on 23 July 2026. The commissioning of a peer review suggests Council itself is not satisfied the technical responses are adequate.

Water supply has not been assessed

The water supply assessment is based on the same 198 people figure. No firefighting capacity assessment, storage analysis, or network augmentation assessment has been provided. This matters particularly in Port Douglas: during Cyclone Jasper in December 2023, the town's water supply was knocked out for days. Adding 526+ people to a network that has recently demonstrated its fragility, without any capacity assessment, is not acceptable.

5: This Land Is Zoned Rural — And Council Has Said What That Means

The site is Rural zoned under both the Planning Scheme and the FNQ Regional Plan 2026

The subject site is zoned Rural under the Douglas Shire Planning Scheme 2018. It is within the Regional Landscape and Rural Production Area under the Far North Queensland Regional Plan 2026 — adopted just three months ago, in May 2026. The brand new Regional Plan still identifies this land as rural production, not urban development.

The Rural Zone Code exists to protect agricultural land from incompatible urban-scale development. A 150-site tourist park and workers accommodation facility with camp kitchen, recreation area, sewage pump station, and advertising signage is not compatible with rural character. It is an urban development proposed on rural land.

Council's own March 2026 decision applies directly here

On 31 March 2026 — less than five months ago — Douglas Shire Council refused the majority of a development application by Rainforest Rescue for ecological reforestation on rural-zoned land in the Lower Daintree. The reasons for refusal are directly on point:

"The fragmentation of agricultural land is inconsistent with the Far North Queensland Regional Plan 2009-2031, the Draft Far North Regional Plan (2025), the State Planning Policy 2017 and the Planning Scheme."

"It is imperative that the natural asset of agricultural land is not undervalued nor eroded. Development must give due regard to valuing and retaining primary production land in the Shire."

If Council refused ecological reforestation on rural land because it would permanently remove an agricultural asset, it cannot now approve a 150-site tourist park on identically-zoned rural land without an explanation of why the same principles do not apply.

The Mossman Mill argument was rejected in that same decision

The applicant argues that agricultural viability has been diminished by the Mossman Mill closure. Council addressed this argument in the March 2026 reforestation decision:

"The profitability for sugarcane production is based on the lack of a local Mill and the costs to transport the product to another Mill, not the ability of the land to grow the product. The forever loss of agricultural land does not yield a sustainable land use."

Council cannot accept the Mossman Mill closure as justification for a tourist park on rural land having explicitly rejected that same argument just five months ago.

The Tourist Park definition excludes what the applicant is actually proposing

The applicant argues that Workers' Accommodation is "an equivalent use" to Tourist Park. But the planning scheme's own definition of Tourist Park explicitly excludes "non-resident workforce accommodation." Workers' Accommodation is non-resident workforce accommodation.

The previous Tourist Park approval on this site also lapsed without being acted upon — suggesting the use was not viable enough to proceed. A lapsed approval carries no planning weight.

6: Protected Vegetation and the Missing s22A Determination

The application mapping identifies Matters of State Environmental Significance on and around the site: MSES Regulated Vegetation (Of Concern Regional Ecosystem) and MSES Regulated Vegetation (Intersecting a Watercourse) along Crees Creek.

The amended report confirms the pump station is located within Category R — Reef Regrowth Watercourse Vegetation — and claims no clearing is required. But a pump station needs

excavation, concrete works, pipe connections, and permanent maintenance access. How that can be achieved within Category R watercourse vegetation without disturbance has not been explained.

The sewer main alignment also runs through Category B (Remnant Vegetation) — the highest protection category — as well as Category R and Category C. The applicant claims the underbore means no impact on these allocations. But the entry and exit pits require surface works, and an assumption of zero disturbance to the most protected vegetation categories needs a geotechnical and vegetation impact assessment to back it up. None has been provided.

The developer's own DA Form acknowledges they need a separate vegetation clearing determination from the State Government before touching the protected vegetation on this site. That determination hasn't been made public. Council approving this development doesn't authorise clearing protected vegetation — that requires its own State Government authority. The Queensland Government's own letter in Appendix B of the application makes this explicit: landowner consent is not approval, and all the rules still apply.

7: The Erosion Prone Area Calculation May Be Deliberately Low

The amended report confirms the pump station is within the Erosion Prone Area. The SARA referral threshold is triggered if fill or excavation within the Erosion Prone Area exceeds 1,000 cubic metres.

The applicant estimates access road fill at 500–700 cubic metres — described as a “preliminary” and “conservative” estimate. Conveniently below the threshold. But this estimate does not include excavation for the pump station itself, filling required to bring the pump station above flood level, or the underbore entry pit works — all within the Erosion Prone Area.

When the full volume of works within the Erosion Prone Area is properly calculated, the 1,000 cubic metre threshold may well be exceeded. That calculation has not been provided.

Endeavour Street properties are already within the mapped Erosion Prone Area. Fill and excavation adjacent to a tidal creek in this zone can alter water velocity, flow direction and sediment transport — all of which can accelerate erosion affecting [REDACTED] property and [REDACTED] neighbours’.

8: The Local Plan Code — Wrong Location, Wrong Scale, Wrong Use

The developer themselves nominated the Port Douglas/Craigie Local Plan Code as applying to this site. That code lists Tourist Park and Workers' Accommodation as inconsistent uses in this area. The code's own purpose statement says it should develop as a residential community with some low scale tourism in appropriate locations. A 150-site tourist park on a rural floodplain is not low scale, and this is not an appropriate location.

The interchangeable use proposal makes it worse. The developer wants to switch freely between Tourist Park, Workers' Accommodation and Caretaker's Accommodation depending on what the market demands at any given time. Each use has different impacts on the people living next door. Approving that flexibility without assessing the worst-case scenario is not good enough.

The application describes the site as 'discrete' from the Captain Cook Highway — meaning screened and set back from the road. But a site that's pushed back from the highway doesn't disappear — it just gets closer to Endeavour Street. This is what creates the noise and amenity problem for my neighbours and me.

The proposed development — 94 cabins, 32 caravan/RV sites, a camp kitchen, recreation area, sewage pump station, and advertising signage across 3 hectares of currently open rural land — will change that landscape permanently. No landscape impact assessment has been provided.

9: No Noise Assessment for the People Who Live Here

No acoustic assessment of the development's noise impact on Endeavour Street or Egret Close.

Figure 17 of the amended application shows the Transport Noise Corridor along the Captain Cook Highway. Every noise reference in this application is about protecting the development's own occupants from highway noise. Nothing addresses what the development does to the people who already live here.

Section 10.00 of the amended report addresses residential amenity in five dot points. None mention Endeavour Street, Egret Close, or any acoustic study. The conclusion — "minimal impact on the amenity of the surrounding area" — is stated without evidence.

I can tell you from direct experience that sound carries from this area to Endeavour Street backyards. Music from rare, brief private events at Birdsong BnB reaches as clearly as if the event were in our backyards. But these events are rare and we know they will stop at 10pm. A permanent camp kitchen, recreation area, and 500+ transient occupants working predominantly in hospitality, operating every day and night is a different proposition. Yet it has not been modelled.

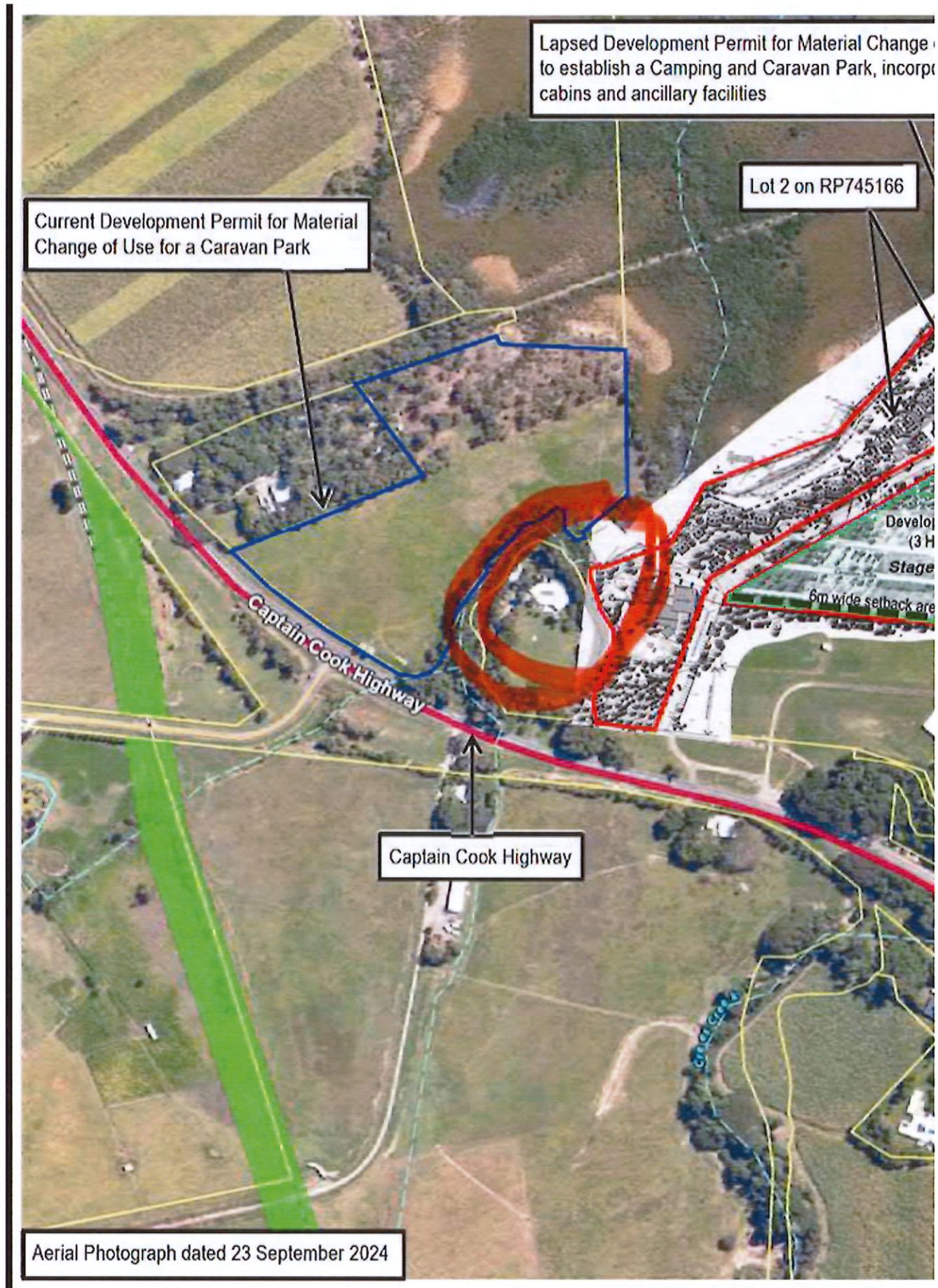
By describing the site as "discrete" from the highway, they are pushing the development toward us. No setback, no acoustic buffer, no operating hours, and no noise management plan have been specified for the Endeavour Street and Egret Close boundary.

Endeavour St is a quiet, established residential street — families, long-term residents, people who chose to live here precisely because of the peace and the natural setting. Crees Creek, the birds, the tropical mornings. That's the character of this neighbourhood.

The proposed development will place a camp kitchen, a recreation area, communal laundry facilities, and accommodation for potentially 500+ people — predominantly hospitality workers on shift patterns — immediately adjacent to that street. Hospitality workers finish late and socialise after shifts. That's not a criticism of them — it's simply the reality of that lifestyle, and it's completely incompatible with a quiet family street at any hour of the night.

No operating hours have been set. No noise management plan exists. No acoustic buffer has been proposed. The developer's response to the amenity impact on Endeavour Street is five dot points and the assertion that impacts will be 'minimal.' That assertion is not supported by any evidence, and it does not reflect the reality of what 500 transient residents adjacent to a quiet residential street will actually sound and feel like to the people who live here.

"Birdsong" BnB circled in red below. Much further away than the proposed development.



10: Federal Environmental Law Has Not Been Addressed

The amended application acknowledges that a portion of the northern edge of the site is within the Great Barrier Reef Coast Marine Park. Crees Creek drains into the GBRMPA catchment.

The Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth) requires referral to the Federal Department when a development has or is likely to have a significant impact on a Matter of National Environmental Significance. The relevant MNES here include the Great Barrier Reef World Heritage Area, the Great Barrier Reef Marine Park, and threatened ecological communities in the mapped MSES vegetation.

The potential impacts are real: a sewer main crossing a tidal reef catchment creek with no failure-mode assessment; acid sulphate soils that have not been tested, adjacent to that same creek; 3 hectares of filled floodplain with no stormwater management plan; disturbance to Category R Reef Regrowth Watercourse Vegetation.

The amended application contains zero reference to the EPBC Act. A search of the public EPBC referrals portal returns no record of a referral having been made for this development. The Queensland Government letter in Appendix B confirms all rules must be complied with. Commonwealth environmental law is one of those rules, and it has not been addressed.

11: Electric Ant Biosecurity Zone — No Management Plan

The development site is confirmed within the Electric Ant Restricted Zone — Craiglie 1 (No. 2) — as shown on the Queensland Government Electric Ant Restricted Zone Map dated 28 February 2023, established under the Biosecurity Act 2014. Crees Creek is specifically labeled within the zone boundary on that map.

Electric ants are one of the world's most invasive species. Douglas Shire Council works actively with Biosecurity Queensland on their eradication in Port Douglas. Within the restricted zone:

- Movement of fill material onto or from a property requires a biosecurity instrument permit
- All machinery must be washed down and free of electric ant carriers before leaving the site
- All persons have a General Biosecurity Obligation to manage known biosecurity risks

This development proposes 2,000–2,500 cubic metres of fill to be brought onto the site. The source of that fill — and whether it comes from within or outside the restricted zone — has not been identified. Significant excavation will produce spoil that must be moved under movement controls. Large-scale machinery will move onto and off the site throughout construction.

The 367-page amended application contains no electric ant management plan, no biosecurity protocol, no identification of fill sources, and no reference to the Biosecurity Act 2014 obligations that apply here. A large-scale earthworks project within the restricted zone without these protections poses a documented risk of spreading electric ants and undermining years of eradication work in this community.

Biosecurity Queensland must be consulted and an electric ant management plan required as a condition of any approval.

12: Failure to Demonstrate First Nations Consultation and Aboriginal Cultural Heritage Duty of Care

Under the *Aboriginal Cultural Heritage Act 2003 (Qld)*, all developers carry a strict legal Duty of Care to avoid harming Indigenous cultural heritage. The applicant's amended town planning report involves clearing and filling 3 hectares of a natural floodplain, alongside directional drilling for a private sewer line underneath the bed of Crees Creek to access Lot 168. Watercourses and their alluvial corridors are well-documented areas of high cultural heritage sensitivity. High-

impact sub-surface excavations and major hydrological alterations present a high risk of disturbing unrecorded artifacts, historical campsites, or subsurface cultural material. The application documents currently fail to provide evidence of an endorsed **Cultural Heritage Management Plan (CHMP)**

13: Outstanding Issues from Original Application — Coastal Management District and Environmental Reserve

The original development application for this site — lodged June 2024 under reference MCUI 2024_5626/1 — was declared not properly made by Council in July 2024, with seven separate deficiencies identified. Two of those deficiencies appear not to have been clearly resolved in the current amended application.

Coastal Management District referral trigger

Council's July 2024 Action Notice identified that the total building footprint exceeds 1,000m² — the trigger for referral to SARA for development in a Coastal Management District under the Planning Regulation 2017. With 94 cabins at approximately 43.35m² each, the total cabin footprint alone is approximately 4,075m² — well above the threshold. The SARA referral in the current application was triggered only for the Captain Cook Highway corridor. It is not clear that the Coastal Management District building footprint trigger has been separately and properly addressed in the amended application.

Lot 67 on R471 — Environmental Reserve

Council's July 2024 Action Notice identified that the proposed pedestrian and cycle path alignment runs through Lot 67 on R471 — a reserve for Environmental Purposes — without landowner consent. The Action Notice required this to be either resolved with proper consent or removed from the application. It is not clear from the amended application that this has been definitively resolved.

14. Traffic, Worker Transport and Emergency Access

The application contains an internal contradiction on worker transport that has not been resolved. The developer argues that a significant proportion of residents will not own private vehicles — using this to reduce the estimated traffic impact on the Captain Cook Highway. Yet the pedestrian and cycle connection that would make car-free living genuinely viable has not been properly designed or approved. Council's own assessment identified concerns about pedestrian and cycle connectivity, and those concerns remain unresolved.

The practical reality of this location makes the assumption of car-free living particularly implausible. The stretch of Captain Cook Highway between the development entrance and Port Douglas town centre is a 100km/h zone with no street lighting. There is no safe footpath or dedicated cycle lane. Walking or cycling between the development and town — where workers would need to travel to reach their jobs in hospitality — is not a realistic option in daylight, let alone at night when hospitality shifts end. The developer cannot rely on low car ownership to reduce traffic impacts while failing to provide any safe or practical alternative.

If workers are expected to live without cars, safe and practical alternatives must actually exist — not just be assumed. If workers will use cars, the traffic assessment must reflect that reality. Either way, the current assessment is inconsistent and incomplete.

The development will generate vehicle movements from workers, tourists, visitors, staff, deliveries, waste collection, maintenance vehicles, and emergency services — across all hours of the day and night. The Captain Cook Highway is a State-controlled road and the only access route in and out of Port Douglas. The cumulative traffic impact during peak periods, shift changes, tourist arrivals and departures, and service vehicle movements has not been properly assessed.

I am also concerned about emergency access and flood evacuation. The development would place potentially 500+ people — many without private vehicles and unfamiliar with local flood behaviour — on a site within the mapped 100 Year flood zone, with a single access point onto a highway that itself floods during severe wet season events. The application does not address:

- How occupants would evacuate during a flood or cyclone
- Whether evacuation routes remain accessible during significant flooding
- How emergency services would reach the site when the highway is cut
- How workers without cars would evacuate at all

Flood immunity cannot be assessed only in terms of cabin floor levels. It must consider the entire development — its access routes, its evacuation capacity, and the number of people placed at risk. None of this has been assessed.

14: Overall

Taken individually, each of the concerns above is serious. Taken together, they describe a 367-page application for a 150-site development on a mapped floodplain that has not properly assessed its impact on the community or the environment.

- **Flood study**
- **Stormwater plan**
- **Acid sulphate soils**
- **Sewage capacity**
- **Water supply**
- **Noise impact on neighbours**
- **Vegetation impacts**
- **Federal environmental law**
- **Electric ant biosecurity**
- **First Nations Consultation**
- **Traffic & Transport**
- **Emergency Access**

The application also proposes full interchangeability between Tourist Park and Workers' Accommodation. Any conditions imposed must be based on the most intensive realistic use scenario — not the most optimistic.

The planning scheme requires that developments of this scale and nature be thoroughly assessed against all applicable codes and overlays.

The flood study Council itself said was essential has not been provided. The sewage calculations are based on less than half the actual design population. There is no stormwater plan, no acoustic assessment for neighbours, no acid sulphate testing, and no reference to Commonwealth environmental law. Every significant technical issue has been deferred to Operational Works Approval — after the decision.

Council's own assessment officer said approval cannot be determined without the flood study. Council's own peer review of the engineering is still ongoing. The FNQ Regional Plan 2026, adopted this year, still identifies this land as rural production. Council's own March 2026 decision refused reforestation on rural land using principles that apply with equal force here.

I respectfully ask Council to:

- Require all outstanding technical assessments to be completed and publicly available
- Give Endeavour Street and Egret Close residents an opportunity to review and respond to those reports; and
- Reject the application

Yours sincerely,

