

[REDACTED]

From: [REDACTED]
Sent: Thursday, 3 September 2026 9:15 PM
To: Enquiries
Subject: FORMAL OBJECTION ? Development Application CA 2025_5732/1 ? Captain Cook Highway, Port Douglas
Attachments: Crees Creek Existing Condition - Photo 1.jpeg; Crees Creek Existing Condition - Photo 2.jpeg; Crees Creek Existing Condition - Photo 3.jpeg; Crees Creek Existing Condition - Photo 4.jpeg; Crees Creek Existing Condition - Photo 5.jpeg; Crees Creek Existing Condition - Photo 6.jpeg; Crees Creek Existing Condition - Photo 7.jpeg; Crees Creek Existing Condition - Photo 8.jpeg; Crees Creek Existing Condition - Photo 9.jpeg

Subject: FORMAL OBJECTION – Development Application CA 2025_5732/1 – Captain Cook Highway, Port Douglas

To: Chief Executive Officer
Douglas Shire Council

Development Application: CA 2025_5732/1

Proposal: Material Change of Use – Undefined Use (Workers' Accommodation), Tourist Park, Caretaker's Accommodation and associated ancillary facilities

Location: Captain Cook Highway, Port Douglas

[REDACTED]

Date: 3 September 2026

Dear Chief Executive Officer and Council Officers,

FORMAL OBJECTION TO DEVELOPMENT APPLICATION CA 2025_5732/1

I wish to formally object to Development Application CA 2025_5732/1 and respectfully request that Douglas Shire Council **refuse the application**.

I have lived at [REDACTED] for approximately [REDACTED]. During that time, I have witnessed considerable change in Port Douglas and have developed a genuine and long-standing interest in the environmental quality, infrastructure, flooding, traffic and residential amenity of our community.

My objection is **not an objection to tourism, workers' accommodation or responsible development**. Port Douglas relies upon tourism and upon the people who work in the tourism industry.

My concern is whether **this particular site is suitable for a development of this scale and intensity**, having regard to its flood characteristics, its immediate relationship with Crees Creek, the infrastructure required to service the development, and the potential downstream environmental and community consequences.

I have followed the progression of this application, including the **July 2026 amendment**, and I am particularly concerned that the revised sewer servicing arrangement now involves the existing Council pump-station

infrastructure on **Lot 168 on RP747298 in the Endeavour Street area**, together with infrastructure associated with **Crees Creek**.

In my view, the application raises significant and unresolved concerns regarding:

- flooding and floodplain management;
- proposed filling and changes to flood behaviour;
- protection of Crees Creek;
- stormwater quality and quantity;
- construction sediment and erosion;
- sewerage capacity and reliability;
- the revised sewer connection and its relationship with Crees Creek;
- downstream environmental impacts;
- traffic and pedestrian safety;
- noise and residential amenity;
- impacts on existing residents; and
- the cumulative impact of all of these matters.

For these reasons, I respectfully ask Council to refuse the application.

1. THE JULY 2026 AMENDMENT IS SIGNIFICANT

The July 2026 amendment deserves particular attention.

The applicant's correspondence to Council dated 6 July 2026 states that, following discussions with Council officers, the preferred sewer connection is a direct connection to the existing Council pump station on **Lot 168 on RP747298 at Endeavour Street**.

The applicant states that land required for the sewer main alignment has consequently been incorporated into the development application.

The corrected confirmation notice subsequently identifies **part of Crees Creek and part of Lot 168** as land associated with the amended application.

I consider this to be a significant change to the environmental and infrastructure context of the proposal.

The development is therefore no longer simply a proposal on land located near a waterway. The current application incorporates infrastructure associated with the waterway environment in order to service the development.

I ask Council to ensure that the environmental and engineering implications of this revised arrangement are **fully assessed and independently scrutinised**, rather than treating the amendment as merely an administrative change to the sewer connection.

2. CREES CREEK IS A CRITICAL ENVIRONMENTAL CONSTRAINT

My principal concern is the relationship between the proposed development, the sewer infrastructure and **Crees Creek**.

The creek is not simply an obstacle or drainage feature that infrastructure needs to cross. It is part of the area's natural drainage and ecological system.

The photographs accompanying this objection provide a useful indication of the existing condition of the creek and its banks immediately to the rear of my property.

As can be seen in the photographs, there are areas exhibiting **significant bank erosion/scouring, exposed root systems, unstable bank material and established creek-side vegetation.**

These photographs are particularly relevant because they demonstrate that the creek environment is not necessarily a robust or highly disturbed corridor capable of absorbing further interference without consequence.

I am concerned that construction activities associated with a sewer crossing or connection could exacerbate existing instability.

Any disturbance associated with:

- trenching;
- excavation;
- boring;
- vegetation removal;
- construction access;
- machinery;
- earthworks;
- drainage alterations; or
- future maintenance and repairs

has the potential to affect the creek corridor.

The proposed sewer connection should therefore be assessed having regard to the **existing physical condition and vulnerability of the creek**, rather than simply whether an engineering solution can technically be constructed.

3. PROPOSED SEWER CONNECTION THROUGH THE CREEK ENVIRONMENT

I consider the proposal to connect the development's sewer infrastructure through the Endeavour Street area, with the associated crossing or interference with the Crees Creek corridor, to be one of the most concerning aspects of the amended application.

In my view, it is unreasonable to regard interference with such a delicate creek environment as an acceptable consequence simply to facilitate the servicing of a development of this scale.

The question should not be:

Can a sewer connection technically be constructed through this area?

The more appropriate question is:

Is it appropriate to introduce infrastructure associated with a high-density accommodation development into a vulnerable creek corridor when alternative servicing arrangements may exist or when the environmental consequences have not been adequately demonstrated?

I ask Council to establish precisely:

- the proposed sewer alignment;

- the exact location at which it crosses or enters the Crees Creek area;
- whether excavation or trenching is proposed;
- whether boring is proposed;
- whether vegetation or riparian areas will be disturbed;
- how the sewer will be protected from flood damage, scour and erosion;
- how construction sediment will be prevented from entering the creek;
- how the infrastructure will be inspected and maintained; and
- how future repairs could be undertaken without repeatedly disturbing the creek.

If Council ultimately approves the development, I reserve my right to **pursue or challenge any approval or associated works through the appropriate legal or planning processes**, particularly if the creek environment is inadequately protected.

4. EXISTING CREEK SCOUR AND BANK INSTABILITY

I have lived [REDACTED] to this environment for approximately [REDACTED] and have observed the creek and surrounding area over a long period.

The attached photographs document the **existing condition of the creek bank immediately** [REDACTED]

The photographs show, among other things:

- exposed and undermined tree roots;
- areas of eroded creek bank;
- exposed soil and bank material;
- areas of scour;
- established creek vegetation;
- unstable sections of the creek edge; and
- the close relationship between the creek and adjoining residential land.

I ask Council's assessment officers and relevant engineers to consider these photographs when assessing the potential effects of the proposed sewer infrastructure, flood behaviour, stormwater discharge and construction activities.

In my view, the existing condition of the creek demonstrates why additional disturbance should not be assumed to be inconsequential.

Photographs – Existing Condition of Crees Creek

Photo 3,4 and 5 – Existing creek channel and eroded/unstable bank conditions.

Photo 7,8 – Existing creek environment and exposed root systems.

Photo 9 – Existing creek bank showing significant erosion/scouring and exposed tree roots.

5. FLOODING AND PROPOSED FILLING

Council's Information Request dated 3 April 2025 identified that the majority of the development area is mapped as floodplain and lies within the **1-in-100-year flood event**.

Council required a localised flood study and specifically required the applicant to demonstrate that the development would:

- appropriately address pre- and post-development flooding;
- identify primary and secondary flow paths;
- address internal drainage;
- address the proposed drainage outlet;
- avoid directing runoff onto neighbouring properties; and
- have no detrimental impacts on Crees Creek.

These are not concerns raised by objectors after the fact. They were concerns identified by Council during its own assessment.

I therefore ask Council to clearly demonstrate how it has satisfied itself that the **current amended proposal**, including the revised sewer arrangement, meets these requirements.

Filling flood-prone land can alter:

- flood storage;
- overland flow paths;
- flood depths;
- flow velocities;
- drainage behaviour; and
- impacts on surrounding properties and waterways.

The assessment should therefore consider the effect of the **development as a whole**, rather than simply whether individual buildings can achieve an acceptable finished-floor level.

6. FLOOD MODELLING AND TOPOGRAPHICAL DATA

I understand that the flood assessment relies upon **2010 LIDAR data**.

I acknowledge that this may be the available source of topographical information. However, the age of the underlying data is relevant where a proposal involves substantial filling and changes to drainage behaviour.

I ask Council to satisfy itself that:

- current ground levels have been accurately represented;
- subsequent changes to surrounding land have been incorporated;
- existing drainage infrastructure is accurately represented;
- proposed filling has been correctly modelled;
- flood storage impacts have been correctly calculated;
- flood behaviour around Crees Creek has been accurately represented; and
- the amended sewer infrastructure has been considered where relevant.

If there is material uncertainty in the flood modelling, I respectfully submit that the uncertainty should be **resolved before approval**, rather than deferred to future conditions.

7. FLOODING AND WASTEWATER ARE INTERCONNECTED

One of my greatest concerns is the combination of the flood risk and the proposed wastewater infrastructure.

A development accommodating a substantial number of workers, tourists and visitors will generate significant additional wastewater.

At the same time, the revised servicing arrangement involves existing Council sewer infrastructure in the Endeavour Street area and infrastructure associated with Crees Creek.

During a significant flood event, infrastructure can be exposed to:

- inundation;
- hydraulic pressure;
- scour;
- erosion;
- power failure;
- pump failure;
- restricted access; and
- physical damage.

A wastewater failure during a flood could therefore become a **water-quality and environmental event**.

I ask Council to require the applicant to demonstrate how the complete wastewater system will perform during significant flood events, including realistic failure scenarios.

8. CAPACITY OF THE LOT 168 PUMP STATION

Council's earlier Information Request identified that the original application had not adequately demonstrated how the development could be connected to the Council sewer network.

The July 2026 amendment now proposes a different arrangement involving the existing Council pump station on **Lot 168 on RP747298**.

The existence of an existing pump station should not, by itself, be treated as evidence that the infrastructure has sufficient capacity for a substantial additional development.

Council should establish:

- the existing design capacity of the pump station;
- current average and peak loading;
- the additional peak wastewater load generated by the development;
- remaining capacity;
- downstream sewer network capacity;
- emergency storage capacity;
- pump redundancy;
- standby power arrangements;
- alarm and emergency response arrangements; and
- the consequences of a prolonged pump or sewer failure.

These matters should be established before Council determines the application.

9. IMPACT ON ENDEAVOUR STREET RESIDENTS

This issue is particularly important to me as an existing resident of **Endeavour Street**.

I have lived at [REDACTED] for approximately [REDACTED]

Residents in this area have invested in their homes and established their lives in a residential environment based upon the planning and infrastructure circumstances that existed when those investments were made.

It is extremely unreasonable, in my view, to expect existing residents to absorb the consequences of introducing a **high-density accommodation facility and associated infrastructure burden into their neighbourhood**, particularly where that infrastructure was not previously contemplated as part of the local residential environment.

The July 2026 amendment potentially changes the infrastructure implications for the Endeavour Street area by introducing a new servicing arrangement involving the existing Council pump station.

Residents should not be expected to simply accept:

- increased construction activity;
- construction traffic;
- trenching or boring;
- construction noise and vibration;
- disruption to existing services;
- additional maintenance activity;
- increased servicing vehicles;
- pump-station impacts;
- potential odour;
- lighting impacts;
- emergency access issues;
- increased risk associated with sewer failure; or
- additional flood-related infrastructure risks

without those impacts being properly assessed.

There is also a legitimate concern regarding **residential amenity and property values**.

Residents have made substantial financial investments in this area without anticipating that the surrounding infrastructure requirements could materially change in order to service a high-density accommodation development.

While I appreciate that property value is not the sole consideration in planning assessment, Council should recognise that significant changes in land use, infrastructure intensity, traffic, noise and environmental risk can have consequences for the amenity and perceived desirability of surrounding residential properties.

It would be unfair for existing residents to bear those consequences without a rigorous assessment of whether the proposed development is appropriately located in the first place.

10. GREAT BARRIER REEF AND DOWNSTREAM ENVIRONMENT

The environmental pathway from this development should be considered as a whole:

Development site → stormwater and sewer infrastructure → Crees Creek → downstream waterways → coastal environment → Great Barrier Reef.

I am particularly concerned about potential increases in:

- sediment;
- nutrients;
- sewage;
- wastewater;
- hydrocarbons;
- chemicals;
- litter; and
- contaminated stormwater.

I am not suggesting that every development near a creek will necessarily damage the Great Barrier Reef.

My concern is the **combination of circumstances in this particular proposal**:

- a substantial accommodation development;
- a flood-prone site;
- proposed filling;
- increased wastewater generation;
- increased stormwater;
- significant earthworks;
- sewer infrastructure associated with Crees Creek; and
- a sensitive downstream coastal environment.

That combination warrants a high level of environmental scrutiny.

11. CONSTRUCTION SEDIMENT AND EROSION

The construction phase itself could represent a significant environmental risk.

The proposal involves substantial earthworks, filling, roads, services and buildings in an environment subject to intense tropical rainfall.

Disturbed soils near Crees Creek could be mobilised during heavy rainfall.

I ask Council to require a detailed, site-specific erosion and sediment control strategy addressing:

- wet-season construction;
- intense rainfall;
- exposed soils;
- stockpiles;
- site access;
- drainage diversions;
- creek protection;
- sediment basins;
- inspection and maintenance;
- emergency response; and
- final rehabilitation.

The existing condition of Crees Creek shown in the attached photographs reinforces the need for particularly careful management.

12. STORMWATER QUALITY AND QUANTITY

The completed development will introduce substantial additional hard surfaces through accommodation, caravan/RV areas, roads, parking, paths and associated infrastructure.

This will change the way rainfall moves across the site.

The issue is not simply whether stormwater can be conveyed away from buildings.

The applicant should demonstrate that the **quality and quantity of water entering Crees Creek will remain acceptable.**

This should include consideration of:

- suspended sediment;
- nutrients;
- hydrocarbons;
- litter;
- vehicle-related pollutants;
- construction contaminants;
- erosion;
- peak rainfall events; and
- long-term maintenance of stormwater treatment infrastructure.

13. WASTEWATER FAILURE AND EMERGENCY MANAGEMENT

The development requires reliable wastewater infrastructure.

Because of the proximity of Crees Creek, the consequences of a failure may be significantly more serious than at a site without such a direct environmental pathway.

Council should require clear evidence regarding:

- emergency wastewater storage;
- standby power;
- pump redundancy;
- alarms;
- automatic shutdown;
- maintenance;
- emergency response;
- flood immunity; and
- consequences of prolonged failure.

The applicant should demonstrate how sewage will be prevented from reaching Crees Creek under both **normal and abnormal operating conditions.**

14. TRAFFIC AND WORKER TRANSPORT

Council's assessment has identified concerns regarding worker transport and pedestrian/cycle connectivity.

The application appears to rely, at least in part, upon an assumption that a significant number of workers will not use private vehicles.

However, if safe and practical pedestrian and cycle connections are not provided, that assumption requires careful examination.

If workers are expected not to rely upon private vehicles, Council should establish **how they will safely travel between the development and Port Douglas.**

Conversely, if workers are realistically expected to use private vehicles, the traffic assessment should reflect that reality.

The development should not rely upon an optimistic assumption about low vehicle ownership in order to minimise its assessed traffic impacts.

15. CAPTAIN COOK HIGHWAY AND LOCAL TRAFFIC

The development will generate vehicle movements associated with:

- workers;
- tourists;
- visitors;
- staff;
- deliveries;
- waste collection;
- maintenance vehicles; and
- emergency services.

The Captain Cook Highway is an important transport corridor and is State controlled.

The assessment should therefore consider the cumulative effects of:

- peak periods;
- worker shift changes;
- tourist arrivals and departures;
- service vehicles;
- pedestrian movements;
- cyclists;
- emergency access; and
- surrounding development.

Safe and practical access should be demonstrated rather than assumed.

16. FLOOD EVACUATION AND EMERGENCY ACCESS

The proposed development would place a substantial number of people on a site affected by flood risk.

This includes workers and tourists who may not be familiar with local flood behaviour.

Council should consider:

- the maximum number of people who could occupy the site;
- evacuation procedures;
- evacuation routes;

- whether those routes remain accessible during significant flooding;
- emergency service access;
- evacuation arrangements for workers without private vehicles; and
- whether the development increases the number of people exposed to flood hazards.

Flood immunity should therefore be considered in terms of the **whole development and its access arrangements**, not simply the finished-floor levels of individual buildings.

17. NOISE AND RESIDENTIAL AMENITY

I also object on the basis of potential noise and amenity impacts.

The proposal combines workers' accommodation and tourist accommodation and therefore has the potential for activity at different times of the day and night.

Potential noise sources include:

- vehicle movements;
- worker shift changes;
- tourist arrivals and departures;
- outdoor activities;
- communal areas;
- deliveries;
- waste collection;
- mechanical equipment; and
- general activity associated with a large accommodation facility.

Council previously requested additional information concerning noise.

I ask Council to assess noise based upon the **realistic operation and maximum occupancy of the development**, rather than an idealised low-noise scenario.

18. WASTE MANAGEMENT

The development will generate substantial additional waste.

Council should be satisfied that waste storage, recycling, collection and odour management are adequate for the proposed scale of development.

Waste storage areas should also be designed to remain secure and contained during significant rainfall and flood events.

There should be no pathway for contaminated water, waste or leachate to enter Crees Creek.

19. INFRASTRUCTURE LOCATION AND ORDERLY DEVELOPMENT

Council's earlier Information Request identified that the premises are outside the **Priority Infrastructure Area**.

I ask Council to consider whether this is an appropriate location for a development of this intensity where significant additional infrastructure works are required.

The question should not simply be whether infrastructure can technically be constructed.

Council should also consider whether:

- infrastructure can be provided safely;
 - adequate capacity exists;
 - required works are appropriately located;
 - environmental impacts can be satisfactorily managed;
 - infrastructure is resilient to flooding;
 - costs and responsibilities are appropriately allocated; and
 - the development represents orderly and appropriate development under the Planning Scheme.
-

20. CUMULATIVE IMPACTS

In my view, the most important issue is the **cumulative effect** of all of these matters.

The proposal simultaneously introduces:

- a substantial accommodation population;
- increased wastewater;
- increased stormwater;
- additional hard surfaces;
- substantial earthworks;
- increased traffic;
- additional waste;
- increased noise;
- flood exposure;
- new sewer infrastructure;
- infrastructure associated with the Crees Creek environment; and
- additional infrastructure activity within an established residential area.

These matters should not be assessed in isolation.

The fundamental question for Council should be:

Is the combined impact of this development appropriate for this particular site and its surrounding environment and community?

In my view, the evidence currently available does not demonstrate that it is.

21. PLANNING SCHEME CONSIDERATIONS

I respectfully request that Council assess the above concerns against **all relevant provisions of the Douglas Shire Planning Scheme**, including the applicable Purpose Outcomes (POs), Acceptable Outcomes (AOs), assessment benchmarks and any relevant State Planning provisions.

In particular, I ask Council to consider the relevant provisions concerning:

Flooding and natural hazards

Whether the development avoids or appropriately manages flood risk, maintains flood storage and flow paths, and avoids adverse impacts on surrounding land and waterways.

Waterways, environmental values and ecological processes

Whether the development protects Crees Creek and associated ecological values from direct and indirect impacts.

Stormwater management

Whether post-development stormwater quantity and quality can be appropriately managed without adverse impacts on Crees Creek or downstream receiving environments.

Water quality and erosion/sediment control

Whether construction and operational activities can avoid unacceptable sediment, nutrient and pollutant impacts.

Infrastructure and servicing

Whether the development can be appropriately serviced by sewer, water, roads and other infrastructure without creating unacceptable impacts on existing infrastructure or surrounding residents.

Traffic, access and pedestrian/cycle connectivity

Whether the proposed development provides safe and practical access for workers, residents, visitors, cyclists and pedestrians.

Residential amenity

Whether the scale, intensity, noise, traffic, lighting, servicing and operational characteristics of the proposal are compatible with surrounding residential areas.

Natural environment and cumulative impacts

Whether the development protects the environmental values of the locality and avoids unacceptable cumulative impacts.

I respectfully request that Council's assessment specifically identify how the proposal satisfies the relevant **POs and AOs**, and, where an AO is not met, how the alternative design or outcome nevertheless satisfies the corresponding Purpose Outcome.

22. SPECIFIC QUESTIONS FOR COUNCIL

Before determining CA 2025_5732/1, I respectfully ask Council to satisfy itself on the following matters.

Crees Creek and sewer

1. What is the precise alignment of the revised sewer main?
2. Exactly where does it cross or enter the Crees Creek area?
3. What construction method will be used?
4. Will excavation or vegetation disturbance occur?
5. How will the infrastructure be protected from scour and erosion?
6. What safeguards prevent sewage entering Crees Creek if the infrastructure fails?
7. How will future maintenance and repair be undertaken without repeated disturbance of the creek corridor?

Flooding

8. Does the latest flood modelling fully account for the amended proposal?
9. Is the underlying topographical information sufficiently current and accurate?
10. Has the effect of proposed fill on Crees Creek been adequately assessed?
11. Has flood-storage loss been adequately assessed?
12. Can emergency access and evacuation be maintained during significant flood events?

Wastewater

13. What is the existing peak capacity of the Lot 168 pump station?
14. What additional peak load will this development generate?
15. What spare capacity remains?
16. What downstream sewer capacity remains?
17. What emergency storage is available?
18. What standby power and pump redundancy are available?
19. What happens during a prolonged failure?

Stormwater and environment

20. What pollutant loads are expected from the completed development?
21. How will sediment and nutrient loads be controlled?
22. How will the creek be protected during construction?
23. How will the development prevent contaminants reaching downstream waterways?
24. How will stormwater treatment systems be monitored and maintained?

Endeavour Street

25. What construction activities will occur in or around the Lot 168 pump-station area?
26. What impacts will those works have on existing residents?
27. What controls will apply to construction noise, vibration, access and hours?
28. What controls will apply to pump noise, odour, lighting and servicing?
29. What arrangements apply if the pump station fails during a flood event?

I respectfully request that these matters be adequately addressed **before Council determines the application.**

23. CONCLUSION AND FINAL RECOMMENDATION

The July 2026 amendment has materially increased my concerns about this proposal.

The application now involves infrastructure associated with **Crees Creek and Lot 168 on RP747298** as part of the revised sewer servicing arrangement, while the development itself remains a substantial accommodation proposal on a site subject to significant flood constraints.

In my view, the combination of:

- flood risk;
- proposed filling;
- stormwater changes;
- existing creek scouring and bank instability;
- construction sediment and erosion risk;
- substantial wastewater generation;
- reliance upon existing Council pump-station infrastructure;
- revised sewer infrastructure associated with Crees Creek;

- potential water-quality impacts;
- downstream environmental sensitivity;
- traffic and pedestrian issues;
- flood evacuation considerations; and
- impacts on the established Endeavour Street residential area

raises **fundamental questions about the suitability of this site for the proposed development.**

I am particularly concerned that environmental and infrastructure risks should not simply be **transferred from the development site to Crees Creek or to an established residential neighbourhood.**

Existing residents should not be expected to bear the infrastructure, environmental and amenity consequences of a development of this scale where those consequences have not been satisfactorily demonstrated to be acceptable.

After approximately [REDACTED] in Port Douglas, I fully understand that the town must evolve and that appropriate development is necessary.

My objection is therefore not an objection to development itself.

It is an objection to **this development, at this location, at this scale and intensity, with the proposed servicing and environmental implications.**

Port Douglas depends upon the quality of its natural environment, waterways, coastal setting and the Great Barrier Reef. These environmental assets also underpin the local economy and the character of the community.

In my respectful view, development should occur in locations where the necessary infrastructure can be provided appropriately, safely and sustainably, without placing unacceptable additional pressure on vulnerable waterways or existing residential communities.

FINAL RECOMMENDATION

I respectfully request that Douglas Shire Council refuse Development Application CA 2025_5732/1.

In particular, I request that Council not approve the application unless and until it is satisfied, on the basis of adequate and independently verifiable information, that:

1. the proposed development will not cause unacceptable changes to flood behaviour or flood storage;
2. Crees Creek and its existing vulnerable banks and ecological values will be protected;
3. the proposed sewer connection and any crossing or interference with the creek corridor are environmentally and technically acceptable;
4. the Lot 168 pump-station infrastructure and downstream sewer network have sufficient capacity and appropriate flood resilience;
5. wastewater failure scenarios have been adequately addressed;
6. construction and operational stormwater will not cause unacceptable impacts on Crees Creek or downstream waterways;
7. traffic, pedestrian, worker transport and emergency access are safe and practical;
8. residential amenity in the Endeavour Street area will not be unreasonably affected; and
9. the proposal satisfies the relevant provisions of the Douglas Shire Planning Scheme and all applicable assessment benchmarks.

If those matters cannot be satisfactorily demonstrated, I respectfully submit that the application should be refused rather than relying upon future conditions to resolve fundamental issues of site suitability, environmental protection and infrastructure capacity.

I ask that this submission be accepted as my **formal objection** and given full consideration in Council's assessment and determination of Development Application CA 2025_5732/1.

Thank you for considering my submission.

Yours faithfully,

A black rectangular redaction box covering the signature area.

Attachments

Attachment 1 – Photographs of Existing Crees Creek Condition

- **Photo 1 and 2:** Existing creek environment in the vicinity of the proposed sewer lines.
 - **Photo 3, 4, 5 and 6:** Existing creek channel and eroded/unstable bank conditions.
 - **Photo 7, 8 and 9:** Existing creek bank showing erosion/scouring and exposed tree roots.
-

















