

[REDACTED]

Sent: Thursday, September 10, 2026 1:43 PM
To: enquires@douglas.qld.gov.au

[REDACTED]

Subject: Fwd: FORMAL OBJECTION TO DEVELOPMENT CA-2025_5732/1

----- Forwarded message -----

[REDACTED]

Date: Wed, 9 Sept 2026, 2:51 pm
Subject: RE: FORMAL OBJECTION TO DEVELOPMENT CA-2025_5732/1

[REDACTED]

Dear [REDACTED]

Thank you for your email. Your correspondence has been forwarded to the relevant staff members for their attention and appropriate action.

I also appreciate you bringing your concerns regarding this matter to my attention.

Kind Regards

[Redacted]

-----Original Message-----

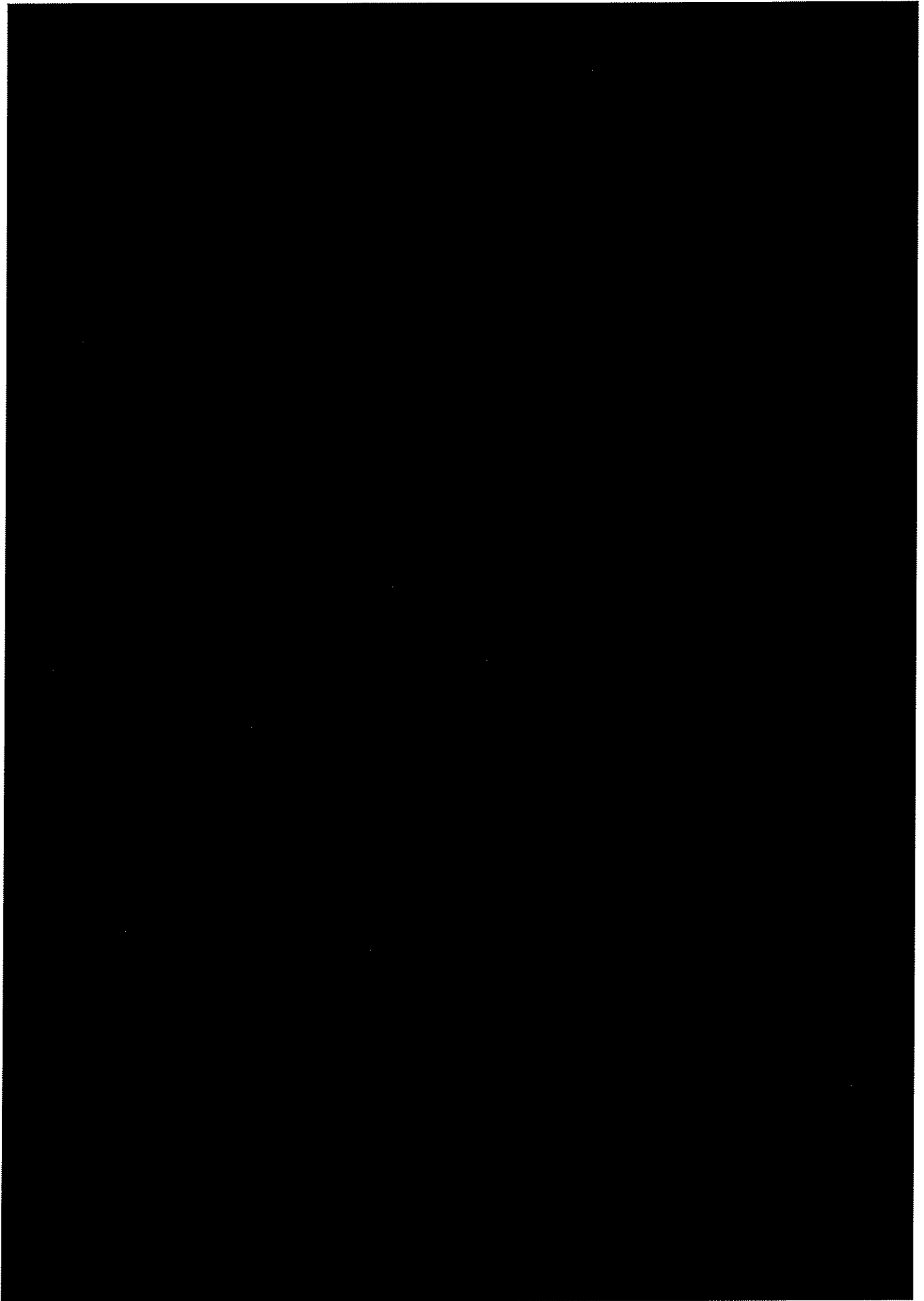
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Sent: Wednesday, September 9, 2026 1:26 PM

To: Enquiries <enquiries@douglas.qld.gov.au>

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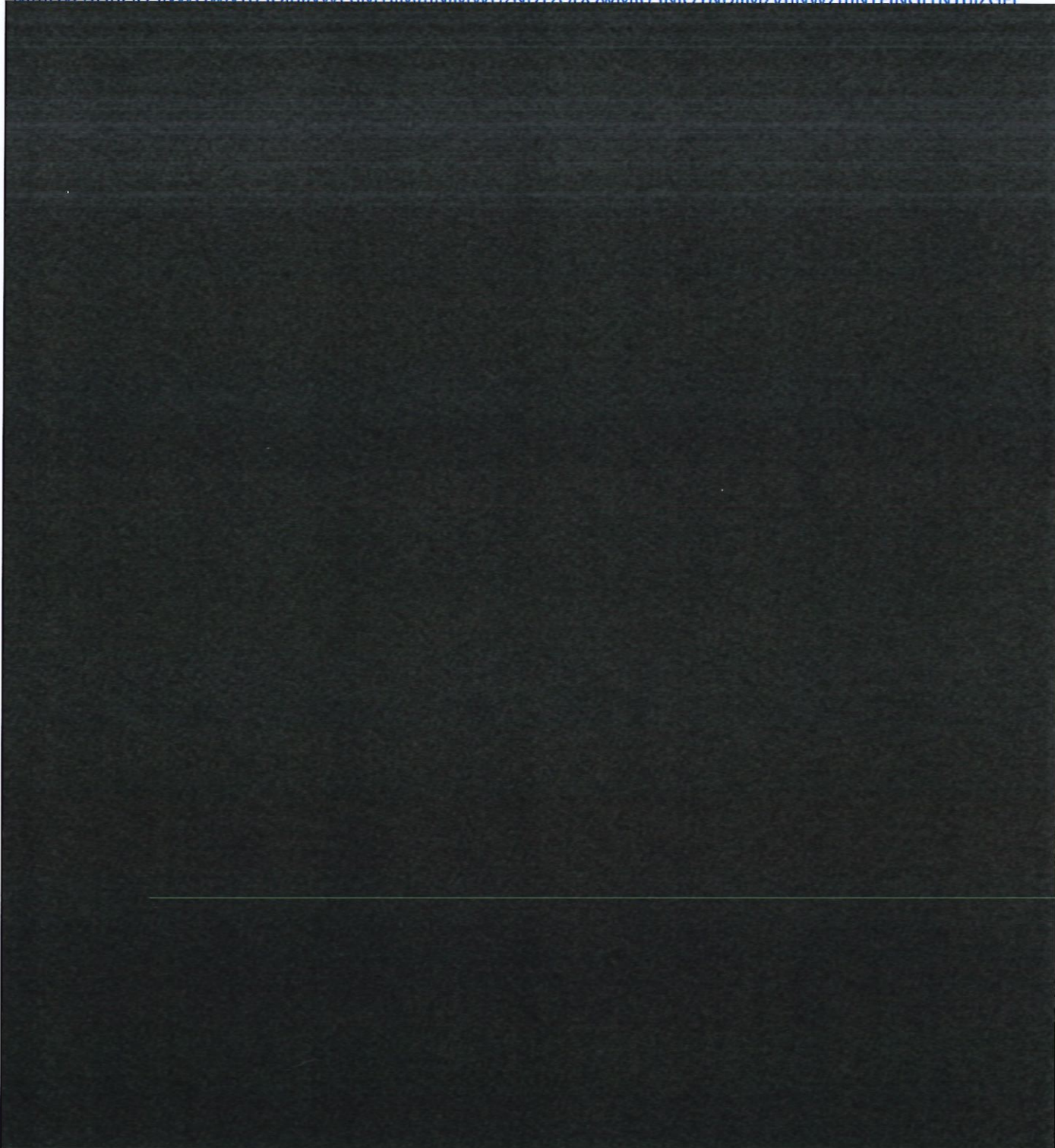
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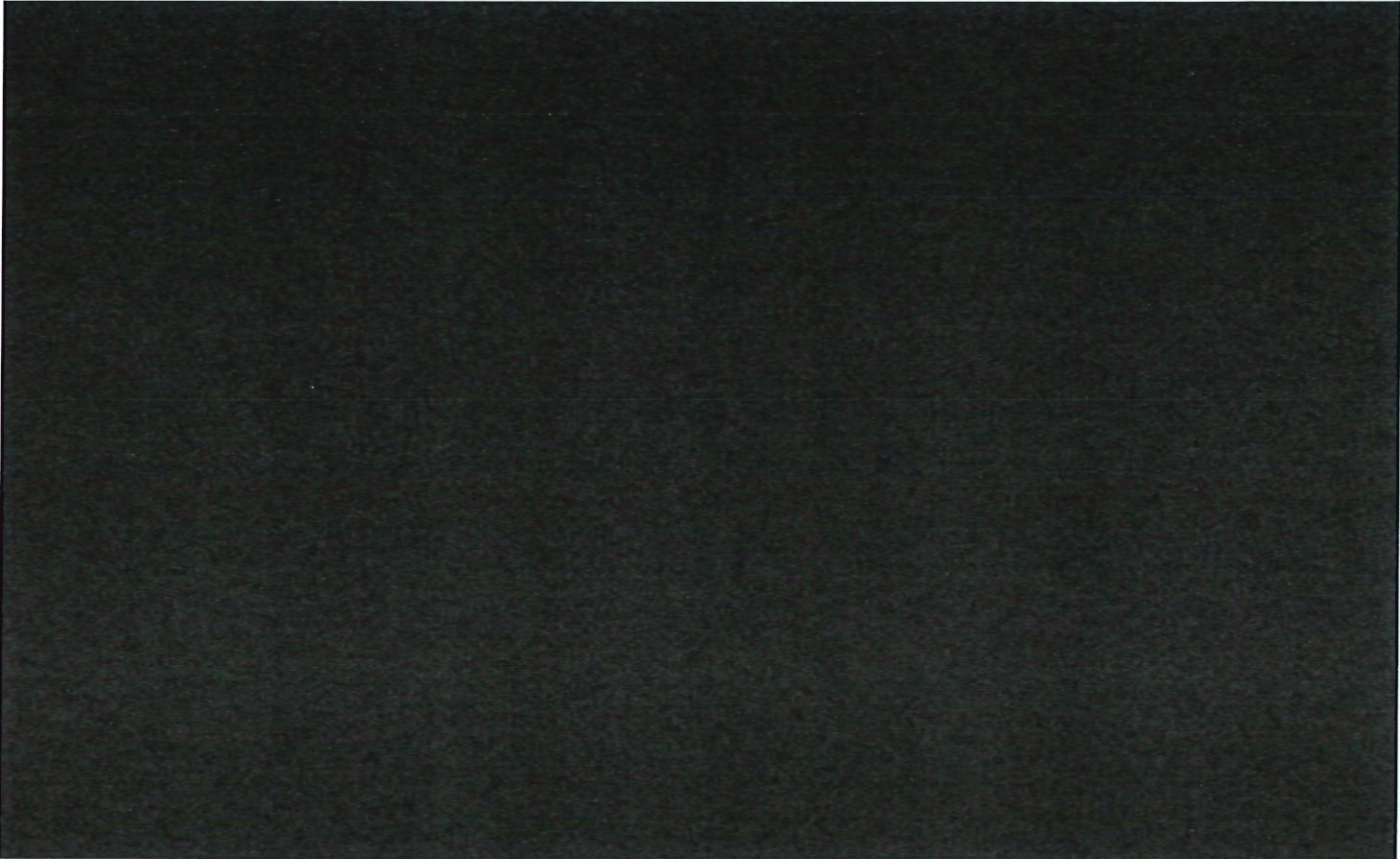
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Manager, Development Assessment

Douglas Shire Council

64-66 Front Street, Mossman QLD 4873



PROPERLY MADE SUBMISSION

Development Application CA-2025_5732

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 my family are [REDACTED] generation Canefarmers who [REDACTED]
[REDACTED]

block was not intended to be disrupted by such a Proposal of this enormity. 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 from the outset 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, and to the back mangrove / Estuary section which borders Endeavour Street, Crees Creek, and the Great Barrier Reef.

[REDACTED]
[REDACTED] implemented the following for any future development in the area:

YOU CAN'T CHANGE THE AGRICULTURAL IMPRINT OF THE AREA; THE URBAN FOOTPRINT HAS TO STAY

YOU CANT BUILD OR MOVE DEVEOLPMENT FROM LOWLAYING AREAS, TO MAKE HIGH AREAS AS IT WILL CAUSE MASS FLOODING

ANOTHER SEPARATE WATER SUPPLY (DAM OR TANKS) FOR USABLE WATER

CULTURAL AND SOCIAL IMPACT HAS TO BE ADDRESSED.

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.

1: The Captain cook Hwy, as well as neighbouring streets backing onto this proposal are Already a Flood Risk Area — This Development Makes It Worse

The DSC Flood and Storm Tide Inundation Overlay Map Sheet FST-020 formally identifies both streets that border the northern section Endeavour an Egret Close, 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.

So 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 no study has 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 own 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 draining into the Great Barrier Reef catchment, 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.

A site-specific acid sulphate soils investigation must be completed before any earthworks are approved.

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.

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.

If the development is permitted, it would cause a significant change in the character of the locality and indicate a change in Council's intentions for the development of this area.

It is good practice to require that any new water and sewerage infrastructure be extended to ALL adjoining properties to enable future connections.

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 my property and my neighbours’.

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

The developer themselves nominated the Port Douglas/Craiglie 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

There is no acoustic assessment of the development's noise impact on all neighbouring properties and surrounds especially from the proposed Private Pump Station.

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 my place. Music from rare, brief private events at Birdsong or from Flames of the forest site on Ferrero Road reaches as clearly as if the event were in my backyard. But they 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, acoustic buffer, operating hours, or noise management plan has been specified for my property, or for the boundaries of Endeavour Street and Egret Close.

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. Not to mention the access to the public road that many first nations families always accessed during my lifetime.

13. THE DEVELOPMENT DOES NOT NOT APPEAR TO REPRESENT 'LOW IMPACT' TOURISM

Performance Outcome PO5 of the rural Zone Code provides for uses that:

Promote low impact tourist activities based on the Appreciation of the rural character, landscape, and rural

activities; or are compatible with rural activities.

The scale of this proposal raises serious doubts as to whether it can be properly be characterised as 'LOW IMPACT'

The proposal should therefore demonstrate specifically

1. How it qualifies as low impact development;
2. how it protects the rural landscape;
3. How it remains compatible with surrounding rural/lifestyle properties;and
4. How the increased population, traffic, lighting, noise, and infrastructure are consistent with the purpose of the rural zone.

14. FUTURE STAGE 2 AND APPARENT FUTURE DEVELOPMENT

The plan supplied with this objection is particularly relevant because it clearly identifies ' Future Stage 2 ' within the proposed development.

This raises concerns about whether the current application represents only part of a much larger intended development. If future stages are planned, Council should consider the Cumulative Impacts of the ultimate development, rather than assessing each stage in isolation.

The community should be provided with sufficient information regarding

The ultimate number of accommodation sites

future buildings

future traffic

future infrastructure

sewer requirements

drainage

lighting

noise

landscaping

boundary treatments as well as

Cultural and Environmental impacts and sensitivity.

If stages 3 and 4 are also contemplated, those stages should be clearly defined and their likely impacts disclosed.

It would be inappropriate for significant cumulative impacts to emerge progressively after the initial approval has already been granted.

15. TRAFFIC GENERATION

The Captain Cook Highway is already at capacity, and this proposed development is likely to generate a substantial increase in vehicle movements. Not to mention the near Fatality directly out front of my property involving a caravan and 3 other vehicles in 2020, And in the past 10 years alone the amount of near Fatalities along that dangerous stretch of highway whether your coming southbound or northbound .

Their proposed figure of 346 vehicle movements per day is half the actual reality of what will be coming in and out past my place daily. This figure does not even consider construction traffic, deliveries, service vehicles, maintenance vehicles, heavy machinery and other movements.

Such a substantial increase requires proper assessment of

Road Capacity

Road Safety

Intersection safety,

Dust disturbance

Noise disturbance

Road Maintenance

Impacts on not only my Property but neighbouring

Pedestrian safety.

16. CLOSURE OR RESTRICTION OF EXISTING ROAD ACCESS

I strongly object to any proposal that would close or restrict access to any existing driveways or roads used by neighbouring Landowners.

Existing residents should not lose established access simply to facilitate a private development.

Council should establish the legal status of the road and clearly identify;

Existing access rights

Proposed closure arrangements

Alternative access;

Emergency access

Maintenance responsibilities

And who will fund any required changes.

I'd further add that

A New Road to mitigate dust, noise, and traffic safety issues from the development should be constructed with a bitumen seal, designed as an appropriate two-way road according to Council's road hierarchy.

17. LIGHTING AND ILLUMINATED SIGNAGE

I STRONGLY OBJECT to the proposed illuminated signage and broader increase in artificial lighting.

The development will introduce lighting associated with ;

Cabins

Roads

Recreation areas

Community Facilities

Security

Parking

Service Areas

And Signage

This has potential to substantially alter the existing night-time character of My own but Neighbouring lifestyle properties and may also affect wildlife associated with Crees Creek and the Mangrove Systems.

I request Council require detailed Lighting plans showing exactly how light spill, glare, and upward illumination will be prevented.

18. AGRICULTURAL BUFFER

The proposed development has the potential to significantly constrain any agricultural use adjoining rural zoned land.

The proposed 6-meter buffer is inadequate to mitigate the effects of spraying or noise from machinery that may be generated by agricultural practices and activities.

An appropriate buffer (often 40mtrs,but subject to expert advice) should be required on the developmemnt land,fully vegetated with appropriate species.The buffer should include such mounding and fencing as is necessary to mitigate the impact of noise from the development upon the adjoining land.

19. STRONGLY OBJECT PO57

'maximise safety and protect visual and acoustic amenities of sensitive land use and minimise impacts on natural characteristic of adjacent areas'

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 — Council said it is essential. It has not been provided.
- * Stormwater plan — to be designed after approval.
- * Acid sulphate soils — untested, despite acknowledged risk.
- * Sewage capacity — calculated on less than half the actual population.
- * Water supply — not assessed.
- * Noise impact on neighbours — not assessed in 367 pages.
- * Vegetation impacts — asserted rather than assessed.
- * Federal environmental law — not addressed.
- * Electric ant biosecurity — not addressed.
- * Cultural Consultation - Not addressed
- * Signage an Lighting plan - not supplied

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 before approval is granted.

After reading 367 pages, I can say that assessment has not been completed. 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.

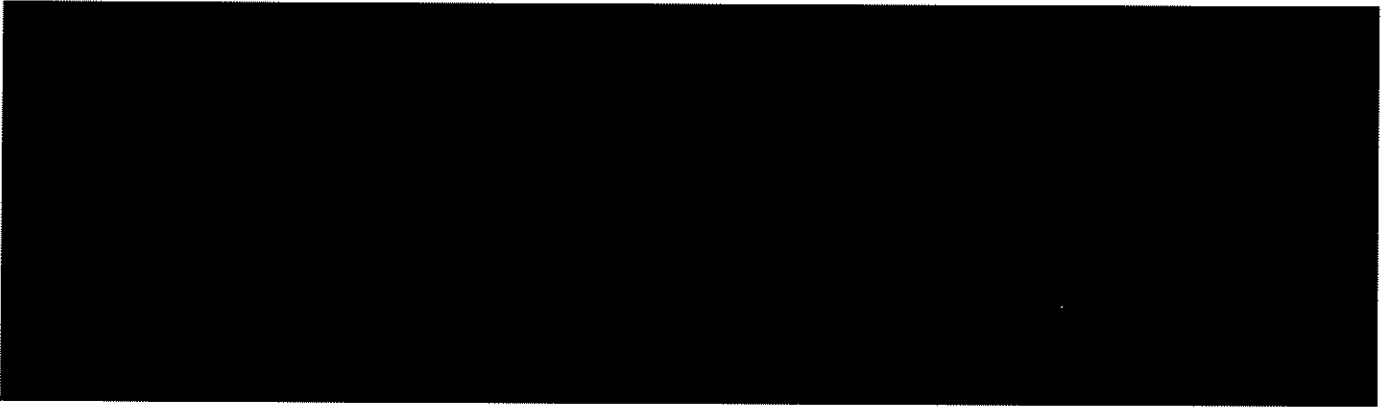
Council's own assessment officer said approval cannot be determined without the flood study. Council's own peer review of the engineering is still ongoing. The FNQ Regional Plan 2026, adopted this year, still identifies this land as rural production. Council's own March 2026 decision refused reforestation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

I ask Council to

- * Require all outstanding technical assessments to be completed and publicly available before this application is determined
- * Give all local residents surrounding this development, including those on Endeavour Street and Egret Close, time to review and respond to those reports
- * Impose the conditions listed above as a minimum if the application is approved.

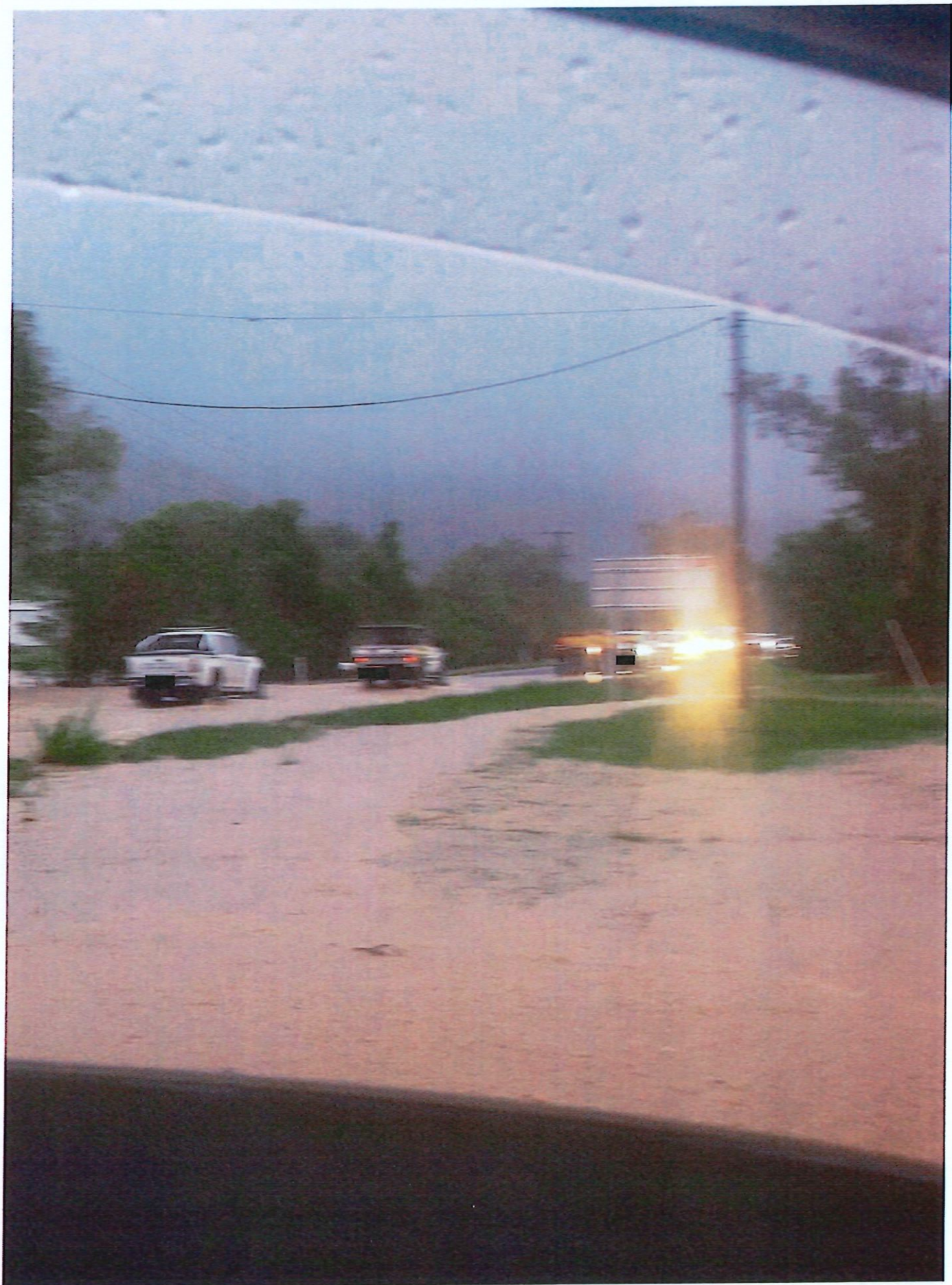
Please find attached photos in support of my objection for your information and attention.

Kind regards











































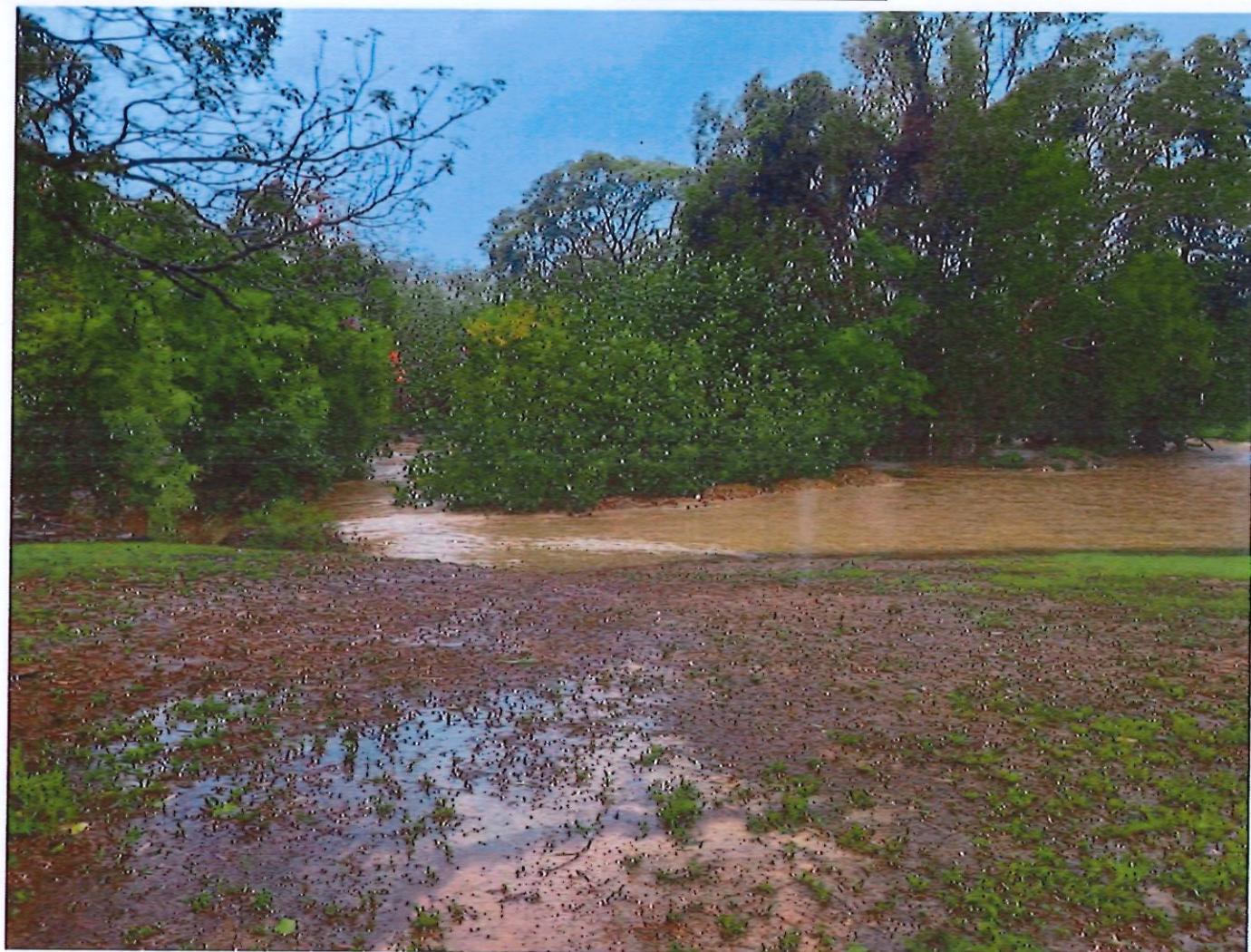














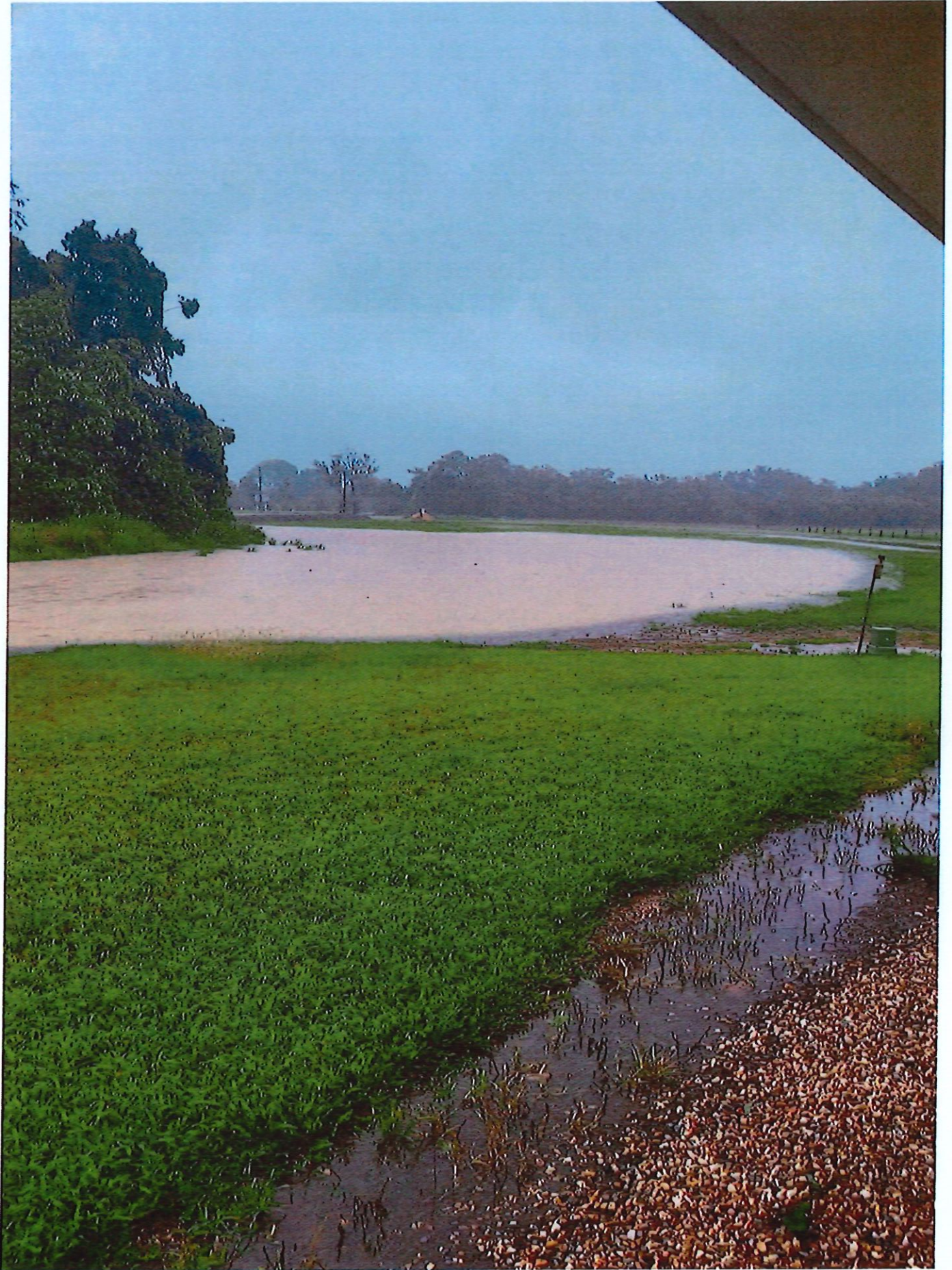












[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]